

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Cross Plains, Allen, Brownwood,)
Burkburnett, Clifton, Commerce,)
San Saba, Vernon, Wellington and)
Wichita Falls, Texas and Anardarko,)
Atoka, Alva, Comanche, Dickson,)
and Duncan, Oklahoma))

MM Docket No. 98-198
RM-9304

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COUNTERPROPOSAL

Respectfully submitted,

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SUMMARY

This counterproposal is filed on behalf of WBAP/KSCS Operating, Ltd. ("WBAP") and Blue Bonnet Radio, Inc. ("BBRI"). BBRI is the licensee of Station KEMM, Commerce, Texas, and WBAP holds an option to acquire KEMM which it intends to exercise at the conclusion of this proceeding. In this counterproposal, the parties request certain improvements to KEMM and its relocation to serve a new community of license, Allen, Texas (1990 Pop. 18,309) as its first local service. Commerce, Texas will retain existing local service, and while the relocation of KEMM will result in a net gain in population served, all loss areas will continue to receive adequate aural service.

In order to make these changes to Station KEMM, several other stations will be required to change channel and/or transmitter site. However each affected licensee has provided a statement consenting to the proposed changes, and therefore this counterproposal requires no involuntary changes for its implementation. WBAP has entered into agreements, where necessary, to reimburse the affected licensees and to ensure that the changes will be implemented in a smooth and orderly manner.

One of the substitutions in this counterproposal conflicts with the proposal set forth in the Commission's Notice of Proposed Rule Making in MM Docket No. 98-198, proposing to allot Channel 245C3 to Cross Plains, Texas. This counterproposal proposes instead to substitute Channel 245C1 to Brownwood, Texas. However, WBAP/BBRI proposes an alternate channel, Channel 290C3, for allotment at Cross Plains. The Cross Plains petitioner, ALALATEX, has provided a statement consenting to the allotment of Channel 290C3 at Cross Plains in place of Channel 245C3. Therefore, both the Cross Plains proposal and this counterproposal can be granted, and no weighing of the public interest benefits is necessary.

Accordingly, for the reasons set forth herein. WBAP and BBRI urge the Commission to accept this counterproposal for public comment.

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COUNTERPROPOSAL

WBAP/KSCS Operating, Ltd. ("WBAP")¹ and Blue Bonnet Radio, Inc. ("BBRI"), licensee of Station KEMM(FM), Commerce, Texas, by their counsel, hereby submit this Counterproposal to the Notice of Proposed Rule Making ("NPRM") 13 FCC Rcd ____ (1998) in the above captioned proceeding. WBAP/BBRI propose the substitution of Channel 277C for Channel 277C2 at Commerce, Texas and its reallocation to Allen, Texas, as its first local service. In order to accomplish this revision to the FM Table of Allotments, the following changes are requested:

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1. WBAP is the holder of an option to purchase KEMM which is to be exercised at the conclusion of this proceeding. WBAP also is the time broker for KEMM. Thus WBAP is the ultimate beneficiary of the channel changes proposed herein and is the responsible party for all reimbursements.

Channels

Community	Existing	Proposed
Anadarko, Oklahoma	279C1	278C/C1
Atoka, Oklahoma	276C2	298A
Alva, Oklahoma	278C1	248C2
Comanche, Oklahoma	246A	287A
Dickson, Oklahoma	278C3	224A
Duncan, Oklahoma	272A	246A
Allen, Texas	-----	277C
Brownwood, Texas	281C1	245C1
Burkburnett, Texas	284C	284C1
Clifton, Texas	277C3	281C3
Commerce, Texas	277C2	-----
Mason, Texas	291A	259A
San Saba, Texas	246A	291A
Vernon, Texas	272A	276A
Wellington, Texas	278C3	298C3
Wichita Falls, Texas	277C1	272C1
Wichita Falls, Texas	273A	280A

I. PRELIMINARY MATTERS

1. WBAP has entered into agreements with all of the stations which are to make changes to their facilities. Each licensee has provided a statement of consent and WBAP will reimburse each of the station licensees pursuant to the agreements.² WBAP recognizes that the Commission may be concerned with the large number of changes needed to effectuate the Allen, Texas proposal. However, WBAP has the financial ability to reimburse all affected stations.³ Furthermore, WBAP has undertaken extensive preparations negotiating the agreements in a manner which will assure the Commission that the changes will be effectuated in a timely manner and with a minimum of disruption to the public and the Commission's resources. WBAP is also aware that First Broadcasting Company, L.P., licensee of Station KNKI(FM), Flower Mound, Texas successfully implemented eight station changes in MM Docket 96-10 this past year

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2. In the unlikely event that an unforeseen circumstance occurs whereby WBAP does not become the licensee, Blue Bonnet Radio, Inc. will reimburse all of the affected stations.
 3. WBAP's parent company is ABC, Inc.

with full cooperation of all the affected stations. WBAP has used the same model for its agreements with the affected stations here and firmly believes that, if approved, the implementation process can proceed smoothly.

2. The Commission has stated that it will not require more than two stations to change channels involuntarily. See Columbus, Nebraska, 59 RR 2d 1185 (1986). However, where all of the affected stations consent to the change in channel, the Commission has no limit to the number of changes to the Table of Allotments. See Castle Rock, Colorado, et al., 8 FCC Rcd 4475 (1993); Farmersville, Texas, et al., 12 FCC Rcd 4099 (1997); recons dismissed 12 FCC Rcd 12056 (1997).

3. WBAP/BBRI hereby states that pursuant to Section 1.420(j), it has not paid nor promised to pay, in any of its agreements, any licensee or permittee for withdrawing an expression of interest, dismissing an application or for forbearing to file an expression of interest or application. In a separate but related filing (counterproposal), First Broadcasting Management, L.L.C. ("FBM") proposes to change the channel and/or transmitter site of several of the same stations included in this counterproposal. WBAP/BBRI and FBM have coordinated their filings and cooperated with each other in negotiating the reimbursement agreements so that regardless of which proposal is ultimately successful or, if preferably, both proposals are successful, all stations will be reimbursed by the benefitting party. Thus, while the WBAP/BBRI and FBM proposals are related, they are in no way contingent upon each other and it is not necessary to process one proposal before the other. Either proposal can be effectuated regardless of the acceptability or outcome of the other. By processing the two proposals together, the Commission could minimize confusion to the affected stations and provide the public the opportunity to comment on some of the same station changes on one occasion rather than in two different contexts.

4. As a final preliminary matter, WBAP/BBRI hereby states that should the Commission substitute Channel 277C for Channel 277C2 and change the community of license from Commerce to Allen,

WBAP will file an application at a new transmitter site to implement the change and will expeditiously construct the facility if authorized to do so.

II. CONFLICT WITH ONE OF THE PROPOSALS SET FORTH IN THE NPRM

5. The NPRM proposed the allotment of Channel 245C3 to Cross Plains, Texas. The instant counterproposal is in conflict with the Cross Plains proposal due to the proposed substitution of Channel 245C1 at Brownwood, Texas. An alternate channel (290C3) has been found for Cross Plains and the petitioner, ALALATEX, has agreed to accept the alternate channel without any consideration promised or paid. See Exhibit 1.

6. If it were necessary to compare the Cross Plains proposal with the instant WBAP/BBRI proposal, as will be demonstrated, the proposal for a first local service at Allen, Texas is far superior to the NPRM's proposal to provide a first local service at Cross Plains. With (1) Allen's 1990 U.S. Census Population of 18,309 and a 1998 updated population of 35,600,⁴ (2) a much larger gain area and population and (3) the elimination of several pre-existing short spacings, the instant proposal is of greater public interest benefit than a first local service at Cross Plains (pop. 1,063).

7. In view of the fact that there is no longer a conflict with Cross Plains, the Commission should view this counterproposal under a more relaxed compliance standard rather than the higher standard placed upon counterproposals when other proposals could be affected thereby.

4. See Exhibit 2.

III. COMPLIANCE WITH THE COMMISSION'S TECHNICAL RULES

A. KEMM, Allen, Texas

1. TECHNICAL STUDIES

8. As indicated in the attached Engineering Statement, Channel 277C can be allotted to Allen, Texas at a new transmitter site provided channel substitutions are made at Wichita Falls, Texas, Dickson, Oklahoma, Atoka, Oklahoma and Clifton, Texas.⁵ See Engineering Statement, Figures 1 and 2. In each case the affected licensee (or applicant) has consented to the channel changes as will be discussed herein.

2. CHANGE IN COMMUNITY OF LICENSE

9. In Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License ("Community of License"), 4 FCC Rcd 4870 (1989), recons. granted in part, 5 FCC Rcd 7094 (1990), the Commission stated that in order to change community of license the proposed channel must be mutually exclusive with the existing channel and the new community must be preferred over the existing community under the Commission's allotment priorities. The attached channel study demonstrates that Channel 277C at the reference coordinates proposed at Allen is mutually exclusive with Channel 277C2 at Commerce, Texas. The new community, Allen (1990 U.S. Census Population 18,309), will obtain a first local service whereas Commerce (population 6,825) will retain existing service from Station KETR(FM). Under the Commission's allotment criteria, a first local service at Allen (Priority 3) is preferred over a second local service (Priority 4) at the smaller community of Commerce. See Revision of FM Allotment Policies and Procedures, 90 FCC 2d 88 (1982).

10. In Community of License, *supra* at 7096, the Commission also stated that it was concerned with the potential migration of stations from underserved areas to well-served urban areas. In making this determination, the Commission has been guided by the criteria set forth in Faye and Richard Tuck, 3 FCC

5. The deletion of Channel 277C2 from Commerce will eliminate a pre-existing short spacing to KHKC's vacant Channel 276C2 allotment. See Exhibit 1.

Rcd 5374 (1988). Allen is located at the outermost fringe of the Dallas/Ft. Worth Urbanized Area in Collin County which is a separate county from where Dallas or Ft. Worth are located. In addition, the proposed 70 dBu signal will cover all of the Denton Urbanized Area. Nevertheless, as will be demonstrated, the community of Allen is completely independent of both Dallas/Ft. Worth, Denton and Lewisville.

11. The Commission will consider eight factors in assessing the independence of a specified community: (1) the extent to which the community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; (3) whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facilities, and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries. Faye and Richard Tuck, 3 FCC Rcd 5374, ¶ 36 (1988). All eight factors need not favor the applicant; however, if a majority of the factors demonstrate that the specified community is distinct from the urbanized area, the Commission will treat it as an independent community. *Id.*; Parker and St. Joe, Florida, 11 FCC Rcd 1095, ¶¶ 9-11 (1996) (finding that the proposed community was independent, although it lacked its own telephone directory and local newspaper, and was included in the urbanized area's market by Arbitron); accord Jupiter and Hobe Sound, Florida, 12 FCC Rcd 3570, ¶ 3 (1997) (citing Parker and St. Joe, Florida).

12. In this case, a majority of the eight factors unquestionably demonstrate that Allen is separate and independent from Dallas-Ft. Worth, Denton and Lewisville.

(1) *U.S. Census Bureau Data Indicates that a Substantial Percentage of the Residents of Allen Work in the City of Allen.* According to 1990 U.S. Census Bureau Data, 15.6% of the employment-age residents of Allen work in Allen. A total of 48.5% of its residents work in Collin County (including Allen) and only 25.6% of its residents work in Dallas. *See Exhibit 2.* In addition, since 1990 many new business have moved to Allen providing additional jobs. For example, in the Summer of 1998 the Peerless Group opened in Allen with 225 jobs, Dey Laboratories opened in Allen with 400 jobs, and the Allen Office Center opened with 115,200 square feet of prime office space. Further, Micrografx, Inc. is moving to Allen and will bring with it 220 employees.

(2) *The City of Allen has its own Newspaper that Covers the Needs and Interests of the Community.* *The Allen American* is a local newspaper published in Allen, which began publishing in 1970. It provides news coverage to the citizens of Allen and the surrounding communities of Lucas and Fairview. Its goal is to provide news that impacts the daily lives of the growing Allen community. It is published twice-weekly on Wednesdays and Saturdays. In addition, the City maintains its own webpage at <www.ci.allen.tx.us>, which contains a wide variety of facts and materials concerning Allen, including information regarding city officials, public services, city development, city jobs and city departments and their agendas. Further, the Public Information Office of Allen publishes a quarterly report (*Municipal Messenger*) and annual report (*State of the City*).

(3) *Community Leaders and Residents Perceive Themselves as Separate From Dallas-Ft. Worth and Denton.* The perception of independence is reflected in the history of Allen. Allen, which was originally inhabited by Caddo and Comanche Indian tribes, was first settled by European immigrants in the 1840s. Allen began to flourish with the introduction of the Houston and Texas Central Railroad, which was constructed through Allen in 1872. Passenger transportation was further enhanced by the electric railway that was built through Allen in 1908. Around this time a bank was opened in Allen and the Allen Telephone Exchange began its operations. The town was officially incorporated in 1953.

13. Allen is now a rapidly growing city 25 miles north of downtown Dallas. Its incorporated area is 26.43 square miles, and the total area of the City is 27.1 square miles. Although 1990 U.S. Census Data states the population of Allen is 18,309, its population as of January 1, 1998 is 35,650 according to the North Central Texas Council of Governments. *See Exhibit 2.*

(4) *Allen Has Its Own Local Government and Elected Officials.* Allen's City government functions independently of the city governments of Dallas-Ft. Worth and Denton. The City of Allen became a Home Rule City in 1979 when it adopted the Allen City Charter. It has a Council-Manager form of government, run by an elected Mayor and a six-member elected City Council, each of whom is elected for 2-year terms. The Council writes governing policies, adopts ordinances and resolutions, appoints members to boards and commissions, hires the City Manager, City Secretary, City Attorney and Municipal Court Judge, and appoints the City Health Officer. There are approximately 250 full-time City employees, including employees of the following departments: Animal Control; City Hall; Police Department; Fire Department; Municipal Court; Finance Department; Parks & Recreation; and Public Works Department. The City of Allen has a \$25 million total budget and both the City and the Allen Independent School District have taxing authority over the residents of Allen. *See Exhibit 2.*

(5) *The City of Allen Has its Own Zip Codes.* The zip codes designated exclusively for the City of Allen are 75002 and 75013. *See Exhibit 2.* The U.S. Postal Service operates a Post Office on W. Boyd Drive in Allen to service the City.

(6) *Allen Has Numerous Commercial Establishments and Its Own Health Facilities.* There are numerous businesses located within Allen. *See Exhibit 2.* The Allen Chamber of Commerce has about 500 members who, in order to join, must "do business" in Allen. The Chamber of Commerce estimates that there are 700 businesses located in Allen. A substantial number of these businesses identify with the community by using "Allen" in their name, for example: Allen Automotive Repair; Allen Cleaners; Allen Balloon & Confection; Allen Flower & Gift Shop; Allen Glass Co.; Allen Locksmith; Allen Music; Allen

Sports Center; Allen Wholesale Appliance Co.; Allen Pet Grooming; Allen School of Music; Allen Travel Service; Allen Personal Service; Allen Feed Center Inc.; Allen Foreign and Domestic Auto; Allen Massage Therapy; Allen Apothecary; Allen Conservatory of Dance; and Allen Country Cutlery II.

14. In addition, Allen has a new publicly-owned, 92-acre technology park (the Millennium Business Park) that has attracted several new high tech firms. According to the Allen Economic Development Corporation, Millennium Park will feature seven companies and more than 1,500 employees. The Allen Economic Development Corporation recently announced that its new project is the Millennium II Corporate Center, with construction scheduled to begin on the 55 acre park in October 1998.

15. A number of health care providers are located in the City of Allen. *See Exhibit 2.* Medical services are available for community residents from many local doctors, some of whom practice with the following groups: Allen Radiology Service; Allen Pediatrics; Family Medical Clinic of Allen; and Allen Family Practice Association. In addition, Presbyterian Healthcare has plans to construct a new 67,000 square foot medical center in Allen that will provide ambulatory care, surgical services, diagnostic services and urgent/emergent care. It will also feature approximately 44,000 square feet for medical offices. Dental care is provided by both the Allen Dental Center and Family Dentistry in Allen, as well as by various other local dentists. Vision care is available at Allen Eyecare Center and Allen Vision Center. Veterinary services may be obtained at Allen Animal Clinic, Inc. and Allen Veterinary Hospital

16. A full range of parks and recreation services are available to the residents of Allen, including 16 public parks (two of which are larger than 50 acres), one golf course (Fairview Golf Center), one recreation center, five tennis courts, 13 baseball diamonds, 9 soccer fields and one lake. There is also a community club house that can be rented at Bethany Lakes Park in Allen. The recreation center contains a fitness room, gymnasium, elevated jogging track, game room, locker rooms, meeting rooms, and hillside amphitheater. It also offers classes, including classes for children in the summertime. The City has already dedicated the first phase of the new Allen Station Park, which will add 40 acres of recreational facilities to

the City's 407-acre park system. The Allen Senior Citizen Center provides activities such as dominoes, bridge, needle work, line dancing, and monthly luncheons.

17. Community activities in the City of Allen include the annual Allen USA Celebration, which takes place just prior to the 4th of July, the annual Christmas parade, which attracts hundreds of people to the City, and the Tree Lighting, which also takes place in December. In addition, the Allen Arts Alliance is active in sponsoring and encouraging cultural events, such as concerts performed by the Allen Symphony.

18. Allen is also home to a number of religious organizations, such as Allen Church of Christ; Allen Heights Baptist Church; Church of Christ; Covenant Baptist Church; Faith Episcopal Church; First Assembly of God in Allen; First Baptist Church of Allen; First United Methodist Church; Immanuel Lutheran Church; and St. Jude Catholic Church. Civic organizations in Allen include the Lions Club, Kiwanis Club, Toastmasters, Jaycees, Rotary, Quilter's Guild, Allen Heritage Guild, Allen Environmental Action League, and Allen Sports Association.

(7) *Extent to which the community and the central city are part of the same advertising market.* Businesses in Allen may advertise in *The Allen American*, which enables them to reach the residents of Allen and does not involve Dallas-Ft. Worth media sources. Residents may also access the City's webpage or read the City's *Municipal Messenger* or *State of the City* to learn about community news and events. Thus, the residents of Allen do not need to travel to Dallas-Ft. Worth or Denton or seek out Dallas-Ft. Worth or Denton media sources in order to find out what is happening in their community.

(8) *Allen Has Its Own Library, and its Police and Fire Protection are Provided Independent of Dallas-Ft. Worth.* Reading materials are made available to the community by the Allen Public Library, which first opened in 1967 and became a city department in 1971. It contains approximately 67,000 books, recordings and art prints and 95 periodical subscriptions.

19. The City's own school district, the Allen Independent School District, consists of 8 elementary schools, 2 middle schools, and 1 high school. Total enrollment for the school district is 8,776

students. The City is currently building a new, high-tech senior high school that is scheduled to be completed in August 1999.

20. The City provides many municipal services to its residents. The Allen Police Department has 33 municipal police officers and includes the following divisions: Animal Control; Community Relations; Criminal Investigation; Patrol; and Traffic. There are also special units within the Police Department, such as Bike Patrol, Crisis Response Team, Inspectional Services, K-9, School Resource Officers, and Street Crimes. The Allen Fire Department, which was established in 1953 to provide fire protection service to the City, currently has 45 paid firemen. Water and sewer services are provided by the City of Allen through the Allen Public Works Department, and billing is handled by the the City's Utility Collections. The City contracts with Community Waste Disposal for garbage collection and recycling.

21. The Tuck showing also considers the relative size and proximity of the central city to the proposed community of license and the signal population coverage. Allen is located 25 miles from Dallas and 28.5 miles from Denton. Allen is 1.8% the size of Dallas, 4.1% of the size of Ft. Worth and 27.8% the size of Denton. The proposed 70 dBu signal will reach less than 1% of the Dallas/Ft. Worth Urbanized Area and no portion of Dallas itself. Traditionally, these factors have less significance than the evidence of independence. See e.g. Headland, Alabama and Chattahoochee, Florida, 10 FCC Rcd 10352 (1995).

22. Finally, the change in 60 dBu coverage will result in a net increase in gain area and population of 22,470 sq. km. and 2,928,528 persons respectively. See Figure 3. The present coverage area will continue to receive at least five aural services. See Atlantic and Glenwood, Iowa, 10 FCC Rcd 3160 (1995) and the attached Engineering Statement, Figures 4 and 5.

B. KWFS, Wichita Falls, Texas

23. In order to allot Channel 277C to Allen, Channel 272C1 is proposed to be substituted for Channel 277C1 at Wichita Falls, Texas with a change in transmitter site provided channel substitutions are made at Vernon, Texas, Duncan, Oklahoma and for another station in Wichita Falls. See Engineering

Statement, Figures 6 and 7. These substitutions are discussed in later sections. The licensee for KWFS has provided a statement in which it consents to the channel and transmitter site changes provided it is reimbursed. See Exhibit 3. WBAP has entered into a reimbursement agreement with KWFS for the expenses incurred in changing channel and transmitter site. WBAP hereby states that it will reimburse KWFS for its expenses. At the new site location, KWFS will serve 157,583 additional persons within its proposed 60 dBu contour. See Figure 8.

C. KVWC, Vernon, Texas

24. In order to allot Channel 272C1 to Wichita Falls, Channel 276A is proposed to be substituted for Channel 272A at Vernon at KVWC's licensed site. See Engineering Statement, Figure 9. The licensee has provided a statement in which it consents to the channel change provided it is reimbursed. See Exhibit 3. WBAP has entered into a reimbursement agreement with KVWC and WBAP states that it will reimburse KVRW for its expenses in changing its channel.

D. Station KKEN, Duncan, Oklahoma

25. In order to allot Channel 272C1 to Wichita Falls, Channel 246A is proposed to be substituted for Channel 272A at Duncan at KKEN's licensed site provided a channel substitution is made at Comanche, Oklahoma. See Engineering Statement, Figure 10. The licensee has provided a statement of consent for the channel change. See Exhibit 3. WBAP has entered into a reimbursement agreement with KKEN for its expenses and WBAP hereby states it will reimburse KKEN for its expenses in changing its channel.

E. Station KDDQ, Comanche, Oklahoma

26. In order to allot Channel 246A to Duncan, Channel 287A is proposed to be substituted for Channel 246A at Comanche at a new transmitter site provided Station KYYI at Burkburnett, Texas makes changes as discussed *infra*. See Engineering Statement, Figures 11 and 12.⁶ The Comanche licensee has

6. The deletion of Channel 246A from Comanche will eliminate an existing short spacing to
(continued...)

provided a statement of consent for the channel and transmitter site changes. See Exhibit 3. WBAP has entered into a reimbursement agreement with KDDQ for its expenses. WBAP hereby states it will reimburse KDDQ for its expenses in changing channel and transmitter site. The change in transmitter site will result in a new gain in service to 6,940 persons. See Engineering Statement, Figure 13.

F. Station KYYI, Burkburnett, Texas

27. In order to allot Channel 287A to Comanche, Channel 284C1 is proposed to be substituted for Channel 284C at Burkburnett, Texas at a new site in accordance with the Commission's spacing requirements. See Engineering Statement, Figure 14. This proposal is the same as that specified in Station KYYI's unbuilt construction permit (BPH-980115IC). However, as will be further discussed, *infra*, WBAP/BRRI's proposal is not contingent on the Burkburnett license constructing its authorized facility because KYYI has agreed to downgrade and change site as part of this proceeding regardless of whether it constructs its authorized downgraded facility prior to final action on the instant proposal. The KYYI license has provided a statement of consent to the proposed changes in exchange for reimbursement in Exhibit 3. WBAP hereby states that it has entered into a reimbursement agreement with KYYI and hereby states that it will reimburse KYYI for its expenses in changing class of channel and transmitter site.

G. Station KQXC(FM), Wichita Falls, Texas

28. In order to allot Channel 272C1 to Wichita Falls for KWFS, Station KQXC(FM)'s channel must change from Channel 273A to Channel 280A. Station KQWC has provided a statement consenting to the change in channel. See Exhibit 3. A channel study is provided to demonstrate compliance with Section 73.207. See Engineering Statement, Figure 15. WBAP has entered into a reimbursement agreement and hereby states that it will reimburse KQWC for the costs of a channel change.

6. (...continued)
Station KEGL on Channel 246C, Forth Worth, Texas.

H. Station KRPT, Anadarko, Oklahoma

29. In order to allot Channel 280A to Wichita Falls, Station KRPT must change channels from Channel 279C1 to Channel 278C a new transmitter site at Anadarko. See Engineering Statement, Figures 16 and 17. In order to make this change, channel substitutions must occur at Alva, Oklahoma (vacant), Wellington, Texas (vacant), Wichita Falls (as discussed earlier) and Dickson (as will be discussed *infra*). The licensee has provided a statement of consent to the proposed change in exchange for reimbursement in Exhibit 3. The upgrade of this station to Class C facilities would provide a net gain in area and population of 19,820 sq. km and 237,054 persons. See Engineering Statement, Figure 18.

I. Channel 278C1 at Alva, Oklahoma

30. In order to allot Channel 278C to Anadarko, Channel 278C1 at Alva can be downgraded to Channel 248C2 and the proposed site relocated. See Engineering Statement, Figures 19 and 20. There is one pending applicant for this channel, George S. Flinn, Jr. Mr. Flinn has provided a statement indicating that he is willing to amend his application for Channel 278C1 to specify Channel 248C2 at a new site if the application is still pending when the rule making is acted upon. However, if the application has been granted and the facility constructed prior to finality of this rule making, Mr. Flinn states that he will amend to specify the WBAP/BRRRI proposed facility. See Exhibit 3. WBAP hereby states that should it be necessary to reimburse for change in a constructed facility, it is willing to do so.

J. Channel 278C3 Wellington, Texas

31. In order to allot Channel 278C to Anadarko, Channel 298C3 can be substituted for Channel 278C3 at Wellington, Texas at the reference coordinates. See Engineering Statement, Figure 22. This channel is vacant with no applications pending.

K. Channel 278C3, Dickson, Oklahoma

32. There are currently four pending applicants for Channel 278C3 at Dickson, Oklahoma. Each applicant has provided a statement in which it states it is willing to amend its application to specify Channel

224A with new transmitter sites to serve Dickson. See Exhibit 3. Each of the pending application sites have encountered electromagnetic interference (EMI) problems according to the Federal Aviation Administration's study and may be required to amend in any event. Should one of the applications obtain a permit for Channel 278C3 prior to final action in this proceeding and construct the facility, WBAP hereby states that it is willing to reimburse the permittee/licensee for its costs in changing channel and transmitter site, if necessary. In this regard, WBAP has entered into a reimbursement agreement with the applicants in the event the facility is constructed prior to final action here. A channel study is provided demonstrating that Channel 224A can be allotted to Dickson at a new reference point. See Engineering Statement, Figures 23 and 24.

L. Station KHKC, Atoka, Oklahoma

33. Station KHKC currently operates with Class A facilities on Channel 276. In MM Docket 87-322, the licensee requested and was granted an upgrade to Channel 276C2 at a new site at Atoka. See Report and Order, 3 FCC Rcd 630 (1988).

34. WBAP requests that the Commission downgrade the Channel 276C2 allotment to Channel 298A at a new transmitter site. A channel study is provided. See Engineering Statement, Figure 26. The Atoka licensee has provided its statement of consent for the downgrade in class and transmitter relocation. See Exhibit 3.

35. The Atoka licensee has filed an application for Channel 276C2 (BPH-981109II). That application is not to be withdrawn, and the licensee states that it has not received or been promised consideration in exchange from withdrawing that application. Should the application be granted, the Atoka licensee may construct and operate as a Class C2. However, upon finality of this rule making proposal, the Atoka licensee states that it would then be willing to downgrade to a Class A and relocate its transmitter provided it is reimbursed for those changes. In lieu of reimbursement, WBAP has entered into an agreement with the Atoka licensee under which the licensee has agreed to sell the station to WBAP if this

counterproposal is granted. WBAP itself would then apply for and implement the downgrade in class, channel change, and transmitter relocation. As the proposed assignee of Atoka, WBAP also states that it will file an application to implement the channel change if granted by the Commission and construct the facility.

M. Station KWOW, Clifton, Texas

36. In order to allot Channel 277C to Allen, Channel 281C3 is proposed to be substituted for Channel 277C3 at Clifton, Texas. The licensee has a permit to relocate its site (BPH-971222IE). The proposal here to substitute Channel 281C3 meets the Commission's spacing rules at the current license site and at the permit site provided Station KXYL-FM, Brownwood, Texas changes channels. See Engineering Statement, Figures 30 and 31. The Brownwood channel change is discussed in a later section. By this substitution, an existing short spacing on the current channel will be eliminated.⁷ See Engineering Statement. The Clifton licensee has provided a statement of consent to this channel change. See Exhibit 3. WBAP has entered into a reimbursement agreement with KWOW and hereby states it will reimburse KWOW for its expenses.

N. Station KXYL-FM, Brownwood, Texas

37. In order to substitute Channel 281C3 at Clifton, Texas, Channel 245C1 is proposed to be substituted at Brownwood for Station KXYL-FM at its current site as shown in the attached Engineering Statement, Figure 32, provided Station KBAL-FM, San Saba changes channel and provided Channel 290C3 is considered for allotment at Cross Plains, Texas. See Paragraphs 5-7, *supra*. A channel substitution for San Saba is discussed, *infra*. A channel study is provided for Channel 290C3 at Cross Plains. See Engineering Statement, Figure 33. As discussed, the Cross Plains proponent has provided a statement that it will accept Channel 290C3 and has not been paid or been promised a payment in exchange for the channel

7. The deletion of Channel 277C3 from Clifton will eliminate a pre-existing short spacing to Station KOOV, Copperas Cove, Texas.

change. The Brownwood licensee has provided a statement of consent to the change in Exhibit No. 3. WBAP has entered into a reimbursement agreement with KXYL and hereby states it will reimburse KXYL for its expenses.

O. Station KBAL, San Saba, Texas

38. In order to allot Channel 245C1 to Brownwood, Texas, Channel 291A is proposed to be substituted for Channel 246A at San Saba, Texas for Station KBAL at its current license site, as shown in the attached Engineering Statement, Figure 34, provided Channel 224A or 281A is substituted for the proposed allotment of Channel 291A at Mason, Texas in MM Docket No. 97-244. Several alternate Class A channels have already been proposed for Mason in MM Docket 97-244. Thus it is clear that the proposed Channel 291A at Mason should not be an impediment to the consideration of substituting Channel 291A at San Saba. A channel study for the proposed substitute channel (Channel 224A or 281A) at Mason is provided in the Engineering Statement, Figures 35 and 36. As for the San Saba substitution the licensee has provided a statement consenting to the channel change (See Exhibit No. 3), and has entered into a reimbursement agreement with WBAP. WBAP hereby states it will reimburse KBAL for its expenses.

IV. THE CUT AND SHOOT CASE

39. WBAP recognizes that its proposal is complicated in that it involves a large number of communities. However, the facts are straightforward and should not present any issues that are difficult to decide. Nevertheless, WBAP desires to comment on the applicability of Cut and Shoot, Texas, *supra*, to one of the proposals offered here.

40. In Cut and Shoot, the Chief, Policy and Rules Division took the occasion to clarify Section 73.208(a)(1)(i) of the Commission's Rules to state that rule making proposals must protect all other station authorizations. As such, proposals (and counterproposals) are required to be capable of being effectuated at the time they are granted and cannot be contingent upon future action by third parties. Cloverdale, Alabama, *et al.* MO&Q 12 FCC Rcd 2090, 2093 (1997).

41. Station KYYI, Burkburnett, Texas has obtained a construction permit to downgrade from a Class C to a Class C1 facility on Channel 284 (BPH-980115IC). Since that station has not completed the downgrade yet, this proposal might otherwise be required to await the licensing of a Class C1 at Burkburnett. However, to avoid waiting for the downgrade to occur, WBAP has obtained the consent of the Burkburnett licensee to downgrade to Class C1 and submitted its consent statement in this proceeding to eliminate the contingency. Since the Burkburnett licensee has agreed with WBAP to downgrade Station KYYI to a Class C1 in exchange for reimbursement, the WBAP/BBRI proposal can be effectuated in this proceeding and is not contingent upon completion of construction pursuant to the existing permit. See Cloverdale, Alabama *supra*. Thus, regardless of whether the downgrade occurs prior to the conclusion of this proceeding, it can be ordered as part of the instant proceeding due to the licensee's consent. In this respect, the Burkburnett downgrade is the same as any other channel or class change proposed herein and does not implicate the Cut and Shoot policy.

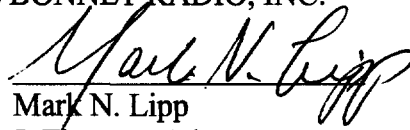
V. CONCLUSION

42. This counterproposal is the result of extensive efforts on the part of many broadcasters in Texas and Oklahoma to improve their stations and provide significant public interest benefits. A large and rapidly growing community, Allen, Texas can receive a needed first local service, a station upgrade can also occur at Anadarko, nearly 3 million people can receive additional service and a large number of stations can eliminate pre-existing short spacings. Despite the number of stations involved, WBAP is confident that the implementation of this proposal can proceed smoothly due to the agreements that have been reached and the cooperation of all parties involved. The overall public interest benefits of the proposal warrant serious consideration by the Commission.

Respectfully submitted,

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December 21, 1998

ENGINEERING STATEMENT

In Support of a

COUNTERPROPOSAL

MM Docket 98-198, RM -9304

Blue Bonnet Radio, Inc./WBAP, Inc
WBAP/KSCS Operating, Ltd.

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ENGINEERING STATEMENT

In Support of a

COUNTERPROPOSAL

MM Docket 98-198, RM-9304

Blue Bonnet Radio, Inc./WBAP, Inc.

SUMMARY OF CHANNEL ASSIGNMENTS

[DEPICTING ALL COMMUNITIES, CHANNELS & MODIFICATIONS]

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMENTS</u>
Commerce, TX	205C1, 277C2	205C1	Delete 277C2 & change community of License.
Allen, TX	-----	277C	Add channel 277C, first local service
Wichita Falls, TX	204A, 208C3, 231C3, 225C1, 260C1, 273A, 277C1 , 292C2	204A, 208C3, 231C3, 225C1, 260C1, 272C1 , 280A, 292C2	Channel & site change.
Vernon, TX	272A	276A	Channel change only.
Duncan, OK	272A	246A	Channel change only.
Comanche, OK	246A	287A	Channel & site change.
Burkburnett, TX	284C	284C1	Downgrade at Licensed site (existing C.P.)
Wichita Falls, TX	204A, 208C3, 231C3, 225C1, 260C1, 273A , 277C1, 292C2	204A, 208C3, 231C3, 225C1, 260C1, 272C1 , 280A , 292C2	Change channel only.
Anadarko, OK	279C1	278C	Upgrade with channel & site change.
Alva, OK	278C1	248C2	Downgrade & change channel
Wellington, OK	278C3	298C3	Channel change only.
Dickson, OK	278C3	224A	Change channel, class, & site.
Atoka, OK	276A , (AP 276C2	298A	Change channel, class, & site.
Clifton, TX	277C3	281C3	Channel change only.
Brownwood, TX	207A, 212A, 219A, 257C2, 268C1, 281C1	207A, 212A, 219A, 245C1 , 257C2, 268C1	Channel change only.
Cross Plains, TX	245C3	290C3	Channel change only.
San Saba, TX	246A	291A	Channel change only.
Mason, TX	291A	224A or 281A	Channel change only.

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

**MM Docket 98-198
Blue Bonnet Radio, Inc.
WBAP/KSCS Operating, Ltd.**

Prepared By

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December 21, 1998

Engineering Statement
In Support of a
Counterproposal
MM Docket 98-198
Blue Bonnet/WBAP Radio, Inc.
WBAP/KSCS Operating, Ltd.

General

The instant counterproposal was prepared for Blue Bonnet Radio, Inc. ("Blue Bonnet"), the licensee of KEMM, channel 277C2, Commerce, Texas, and WBAP/KSCS Operating Ltd. ("Blue Bonnet/WBAP"). It is prepared and submitted in response to an NPRM for MM Docket 98-198 (see DA98-2188). Blue Bonnet/WBAP proposes to delete channel 277C2 at Commerce and subsequently allocate channel 277C at Allen, Texas. It proposes that the license of KEMM be modified accordingly.

The instant counterproposal is mutually exclusive (MX) with the NPRM in its proposed use of channel 245C3 at Cross Plains, Texas. However, a substitution is proposed which eliminates the MX conflicts between the instant counterproposal and the NPRM. If the Commission adopts the Blue Bonnet/WBAP counterproposal as submitted, all parties in the NPRM and the instant counterproposal can receive its requested facility changes.

Methods

The Blue Bonnet/WBAP counterproposal is presented in sections, with each channel or licensed facility where a change is proposed is discussed individually. All sections begin with an allocation or channel spacing study. The proposed modification's technical compliance is then supported by additional exhibits.

All searches were performed on a V-Soft SearchFM program and verified with the EDX FMSR search program. The FCC F(50,50) contours were calculated using SoftWright's Terrain Analysis Package (TAP) Version 4.00.282. The studies were based on the latest technical data from the Commission's databases. Mapping, population counts, and gain/loss areas were conducted by a professional mapping program from MapInfo Corporation, Version 5.0. The program contains the exact community boundaries of the relevant cities. In pertinent cases where community boundaries were critical, the boundaries were cross-checked with the U.S. Census Bureau's TIGER maps.

All modifications that require a class change or antenna site modification have a gain/loss study for population and square kilometers. The one study which includes a community of license change includes a remaining services study, which demonstrates more than five (5) remaining services in the loss area.

Nature of the Blue Bonnet/WBAP Counterproposal

A summary of all communities and their related channels (present and proposed) is included in Table 1 for reference. Blue Bonnet/WBAP proposes to delete channel 277C3 at Commerce and substitute channel 277C at Allen, Texas for use by KEMM. In order to accomplish this, various channels and licensed facilities are proposed to be modified in order to create compliance with §73.207. The counterproposal provides for a first local service at Allen and an increase in square kilometers covered. This is demonstrated by the large increase in the number of persons served by the new 60-dBu contour.

The allotment of channel 277C at Allen requires the following modifications:

- I). KWFS - channel 277C1, Wichita Falls, Texas. Presently KWFS operates on channel 277C1, co-channel with the proposed upgrade of KEMM and has short-spacing of

118.64 kilometers. Blue Bonnet/WBAP proposes to eliminate this short-spacing by substituting channel 272C1 for channel 277C1 at a new antenna site. However, when channel 272C1 is substituted for channel 277C1, short-spacings to KVWC in Vernon, Texas; KKEN in Duncan, Oklahoma; and KQXC in Wichita Falls occur. In order to accomplish these short-spacings, the following additional facility changes must occur.

A) KVWC -channel 272A, Vernon, Texas. Operates on channel 272A. If KWFS also operates on channel 272 as a class C1, a short-space of 151.25 kilometers is created. Therefore, BlueBonnet/WBAP proposes to substitute channel 276A for channel 272A at the licensed site of KVWC. This allotment can only occur simultaneously with the deletion of channel 277C1 at Wichita Falls.

B) KKEN - channel 272A, Duncan, Oklahoma. Presently KKEN operates on channel 272A. The substitution of channel 272C1 at Wichita Falls creates a short-space to KKEN of 112.53 kilometers. BlueBonnet/WBAP proposes to eliminate this short-space by substituting channel 246A at the licensed site of KKEN. However, in order to use channel 246A, the following substitutions must occur.

1) KDDQ - channel 246A, Comanche, Oklahoma. Presently KDDQ operates on channel 246A. The substitution of channel 246A at Duncan creates a short-space of 105.24 kilometers between KKEN and KDDQ. BlueBonnet/WBAP can eliminate this short-space due to a non-related change in the spectrum by the licensee of KYYI,

Burkburnett, Texas. The substitution of channel 287A for channel 246A at Comanche requires a site change.

- a) KYYI - channel 284C, Burkburnett, Texas. Presently KYYI operates on channel 284C. In this proceeding the licensee of KYYI has agreed to a downgrade to a class C1 on channel 284 at the present KYYI licensed site.

C) KQXC - channel 273A, Wichita Falls, Texas. Presently KQXC operates on channel 273A. The substitution of channel 272C1 at Wichita Falls creates a short-spacing of 111.21 kilometers. BlueBonnet/WBAP proposes to eliminate this short-spacing by substituting channel 280A for channel 273A at Wichita Falls at the current KQXC licensed site. The substitution of channel 280A for use by KQXC is possible due to the substitution of KWFS from the third-adjacent channel (channel 277C1) to the proposed 272C1. In addition, the following channel changes must occur.

- a) KRPT - channel 279C1, Anadarko, Oklahoma. Presently KRPT operates on channel 279C1. The substitution of channel 280A at Wichita Falls creates a short-space of 20.67 kilometers. Bluebonnet/WBAP proposes to eliminate this short-spacing by substituting channel 278C for channel 279C1 at Anadarko. The Anadarko licensee is concurrently seeking this upgrade. However, in order to substitute channel 278C for channel 279C1 at Anadarko, the following channel changes must occur.

- i) AP278C1 - channel 278, Alva, Oklahoma. Presently George S. Flinn, Jr. has an application pending for channel 278C1 at Alva, Oklahoma. The substitution of channel 278C at Anadarko creates a short-spacing to the Flinn application of 138.27 kilometers and a short-space to the allotment site of channel 278C1 at Alva of 135.77 kilometers. BlueBonnet/WBAP proposes to eliminate this short-spacing by the substitution of channel 248C2 with an allocation site change.
- ii) AD278C3 - channel 278, Wellington, Texas. Presently unused channel 278C3 is allotted to Wellington, Texas. The substitution of channel 278C at Anadarko creates a short-spacing to channel 278C3 of 76.97 kilometers. BlueBonnet/WBAP proposes to eliminate this short-spacing by substituting channel 298C3 at the allotment site.
- iii) KWFS, channel 277C1, Wichita Falls, Texas. The upgrade of KRPT on channel 278C creates a short-spacing to KWFS on channel 277C1 of 43.31 kilometers. This short-space is of concern, but the conflict is eliminated by the BlueBonnet/WBAP substitution of channel 272C1 for channel 277C1 at Wichita Falls.
- iv) AP278C3 - channel 278, Dickson, Oklahoma. Presently channel 278C3 is allotted to Dickson, Oklahoma and has four

pending applications. This allotment and pending applications are all short-spaced to the upgrade of KRPT on channel 278C. This short-spacing ranges from 35.79 kilometers to 42.36 kilometers. BlueBonnet/WBAP proposes to eliminate this short-spacing by the substitution of channel 224A for channel 278C3 at Dickson. Presently channel 224A is unusable at Dickson, due to its IF nature with channel 278C3. However, when the BlueBonnet/WBAP counterproposal is implemented, this IF short-spacing will be eliminated by the deletion of channel 278C3. In addition, channel 278C3 at Dickson must also be deleted in order to upgrade KEMM to a class C at Allen, Texas.

This completes all changes proposed by Blue Bonnet/WBAP to eliminate short-spacing for the substitution of channel 272C1 for channel 277C1 at Wichita Falls for use by KWFS.

II). AL278C3/AP278C3 - Dickson, Oklahoma. Channel 278C3 is an allocation at Dickson with four (4) applicants. The allotment of channel 277C at Allen creates a short-space to the Dickson allocation reference of 106.39 kilometers. Blue Bonnet/WBAP proposes to eliminate this short-space by substituting channel 224A with a change in the allocation reference coordinates. All applicants are in agreement to the proposed channel substitution and site change. As discussed previously, the substitution of channel 224A for channel 278C3 at Dickson is

necessary in order to facilitate the upgrade of KRPT to channel 278C at Anadarko and the upgrade of KEMM on channel 277C at Allen.

III). KHKC - channel 276A (pending application for channel 276C2), Atoka, Oklahoma.

If channel 277C is allotted to Allen, short-spacing to AL276C2 at Atoka of 70.08 kilometers, AP276C2 of 69.11 kilometers, and KHKC.L of 46.20 kilometers will be created. Blue Bonnet/WBAP proposes to eliminate this short-space by substituting channel 298A for channel 276A and 276C2 at Atoka with a site change. No other substitutions are required to effectuate this substitution.

IV). KWOW.L and KWOW.C - channel 277C3, Clifton, Texas. Presently KWOW operates on channel 277C3 with a CP to change transmitter sites. The allocation of channel 277C at Allen creates a short-space of 35.78 kilometers and 31.76 kilometers, respectively. Blue Bonnet/WBAP proposes to eliminate this short-space by substituting channel 281C3 at both the licensed and CP sites. In order to effectuate this channel change, the following substitutions must occur.

A) KXYL - channel 281C1, Brownwood, Texas. Presently KXYL operates on channel 281C1. If channel 281C1 is used as a substitute for channel 277C3 at Clifton, a short-space of 64.11 kilometers or 51.73 kilometers is created. Blue Bonnet/WBAP proposes to eliminate this short-spacing by substituting channel 245C1 for channel 281C1 at the KXYL licensed site. In order to effectuate this change, the following substitutions must be made.

1) AD245C3 - Cross Plains, Texas. Presently a NPRM is seeking comments concerning the allotment of channel 245C3 to Cross

Plains. This allotment creates a short-space to the use of channel 245C1 at KXYL, Brownwood of 160.78 kilometers. Blue Bonnet/WBAP proposes to eliminate this short-spacing by substituting channel 290C3 for channel 245C3 at the petitioner's Cross Plains reference coordinates. No other substitutions are required for the allotment of channel 290C3 at Cross Plains. **This is the MX point between the instant BlueBonnet/WBAP counterproposal and the NPRM in MM Docket 98-198.**

2) KBAL - channel 246A, San Saba, Texas. The use of channel 245C1 at the licensed site of KXYL creates a short-space to the licensed site of KBAL of 69.87 kilometers. Blue Bonnet/WBAP proposes to eliminate this short-spacing by substituting channel 291A for channel 246A at the KBAL licensed site. In order to effectuate this change, the following substitution is required.

a) AD291A - Mason, Texas. A pending rulemaking proposes the allotment of channel 291A at Mason, Texas. In the Comments stage, several alternate channels at Mason were proposed. In addition to those channels Blue Bonnet/WBAP proposes the substitution of channel 224A at the community of Mason reference coordinates. If, for some reason, the allotment of channel 224A is not possible, Blue Bonnet/WBAP requests that channel 281A

be allotted instead. Channel 281A can only be used as a substitution when the concurrent substitution of channel 245C1 for channel 281C1 occurs at the licensed site of KXYL, Brownwood, Texas. There is no conflict between the substitution of channel 281C3 at Clifton, Texas and the allotment of channel 281A at Mason, Texas.

This completes the required Table of Allotments' modifications required for the allocation of channel 277C at Allen.

EXHIBITS EXPLAINED

KEMM

Exhibit E, Figure 1 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 277C at Allen. The study depicts all of the major on-channel and adjacent channel modifications required, but not the subchanges. Exhibit E, Figure 2 is a map generated using the programs and techniques in the Methods section of the instant counterproposal. This study depicts the KEMM channel 277C allotment coordinates, a maximum class C 70 dBu contour, and the community boundaries of Allen. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 3 is a map demonstrating the gain and loss area of the respective 60 dBu contours for KEMM. Exhibit E, Figure 4 is a map depicting the remaining services in the loss area after KEMM is deleted at Commerce and allocated to Allen. Exhibit E, Figure 5 is a list of the station used in that study.

KWFS

Exhibit E, Figure 6 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 272C1 at Wichita Falls at the modified reference coordinates. The study depicts all of the major on-channel and adjacent channel modifications required, but not the subchanges. Exhibit E, Figure 7 is a map generated using the programs and techniques in the Methods section of the instant counterproposal. This study depicts the KWFS channel 272C1 allotment coordinates, a maximum class C1 70 dBu contour, and the community boundaries of Wichita Falls. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 8 is a map demonstrating the gain and loss area of the respective 60 dBu contours for KWFS.

KVWC

Exhibit E, Figure 9 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 276A at Vernon, Texas using its licensed coordinates as reference. The study demonstrates a short-space of 60.08 kilometers to the present licensed site of KWFS on channel 277C1. However, this short-space is eliminated as KWFS is moved to channel 272C1. There are no spacing concerns between the allotment of channel 276A and channel 272C1 at Wichita Falls, since the channels are fourth adjacent. The allocation study also depicts the upgrade of KRPT on channel 278C at Anadarko, Oklahoma.

KKEN

Exhibit E, Figure 10 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 246A at the licensed site of KKEN, Duncan, Oklahoma. The study demonstrates a short-space of 105.24 kilometers to the

present CP site of KDDQ, Comanche, Oklahoma, also on channel 246A. However, this short-space is eliminated as KDDQ is moved to channel 287A. The study further shows that there are no additional spacing concerns.

KDDQ

Exhibit E, Figure 11 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 287A at Comanche at the modified reference coordinates. The study shows the KYYI downgrade CP from channel 284C to channel 284C1. Exhibit E, Figure 12 is a map generated using the programs and techniques in the Methods section of the instant counterproposal. This study shows the KDDQ channel 287A allotment coordinates, a maximum class A 70 dBu contour, and the community boundaries of Comanche. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 13 is a map demonstrating the gain and loss area of the respective 60-dBu contours for KDDQ.

KYYI

Exhibit E, Figure 14 is an allocation study depicting the spacing to all known FM facilities that are affected by the CP downgrade of KYYI on channel 284C1 at Burkburnett with the licensed coordinates. The study depicts all of the major on-channel and adjacent channel spacing. No modifications are required. The study also depicts a short-space between channel 284C at the KYYI licensed site and the allotment of channel 287A at Comanche. However, the short-space is eliminated by the exercise of the current KYYI CP for channel 284C1.

KQXC

Exhibit E, Figure 15 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 280A for channel 273A at the licensed site of KQXC, Wichita Falls, Texas. The study demonstrates a short-space of 20.67 kilometers to the present licensed site of KRPT, Anadarko, Oklahoma on channel 279C1. This is the only channel of concern, which is eliminated by the substitution of channel 278C at Anadarko. The short-spacing to third-adjacent channel KWFS (277C1) is eliminated when KWFS is moved to channel 272C1. The study also notes the spacing between channel 280A at Wichita Falls and channel 278C at Anadarko.

KRPT

Exhibit E, Figure 16 is an allocation study showing all the spacings for the upgrade of KRPT, Anadarko, Oklahoma from channel 279C1 to channel 278C. The study uses a reference site 49.99 kilometers from the community of Anadarko and demonstrates short-spacing to a pending application at Alva, Oklahoma; an unused channel at Wellington, Texas; the licensed facility of KWFS, Wichita Falls, Texas; and four (4) pending applications at Dickson, Oklahoma. Exhibit E, Figure 17 is a map that shows the maximum class C 70-dBu contour and the community boundaries of Anadarko. It shows full compliance with §73.315 of the Commission's Rules. Exhibit E, Figure 18 is a gain-loss study map that shows the respective gain and loss area and population counts for KRPT.

AP278C1

Exhibit E, Figure 19 is an allocation study for the substitution of channel 248C2 at Alva, Oklahoma. The study demonstrates that no additional changes are required for this

substitution. Exhibit E, Figure 20 is a map demonstrating a maximum class C2 70-dBu contour to the community boundaries of Alva. It shows full compliance with §73.315 of the Commission's Rules. Exhibit E, Figure 21 is a gain-loss map between the Flinn application facility and the substitution of channel 248C2.

KWFS

See previous KWFS "Exhibits Explained."

AL278C3

Exhibit E, Figure 22 is an allocation study for the substitution of channel 298C3 at Wellington, Texas. Presently Wellington an unused channel allotted (channel 278C3). In order to eliminate the short-spacing created by KRPT on channel 278C, channel 278C3 must be deleted at Wellington with the substitution of channel 298C3. No additional spectrum changes are necessary for this substitution.

AP278C3 (AL278C3)

Exhibit E, Figure 23 is an allocation study for the substitution of channel 224A for channel 278C3 at Dickson, Oklahoma. The study proposes to change the class C3 allotment coordinates at Dickson as well as the classification. Exhibit E, Figure 24 is a map showing the maximum class A hypothetical 70-dBu contour over the city of license (Dickson, Oklahoma). It shows the compliance of channel 224A at Dickson with §73.315 of the Commission's Rules. Exhibit E, Figure 25 is a gain-loss area map, contrasting the 60-dBu service of AP278C3 at the Chuckie Broadcasting Company application site and AD224A at Dickson. The Chuckie site is used as reference due to an agreement reached between all pending applicants.

KHKC

Exhibit E, Figure 26 is an allocation study depicting clear spacing for the substitution of channel 298A for channel 276A (and pending application for channel 276C2) at the modified site of KHKC, Atoka, Oklahoma. No other substitutions are required for this allotment. Exhibit E, Figure 27 is a map generated using the programs and techniques in the Methods section of the instant counterproposal. This study depicts the KHKC channel 298A allotment coordinates, a maximum class A 70-dBu contour, and the community boundaries of Atoka. This map demonstrates full compliance with §73.315 of the Rules.

Exhibit E, Figures 28 and 29 are maps demonstrating the gain and loss areas of the respective 60-dBu contours for KHKC. Exhibit E, Figure 28 is a gain/loss map comparing the 60 dBu of the proposed class A allocation to the licensed class A facility. Exhibit E, Figure 29 is a gain/loss map comparing the class C2 application to the proposed class A.

KWOW.L and KWOW.C

Exhibit E, Figure 30 is an allocation study depicting the substitution of channel 281C3 at the KWOW.L antenna site. Exhibit E, Figure 31 is an allocation study depicting the substitution of channel 281C3 at the KWOW.C site. These studies show that this substitution provides clear spacing, once KXYL at Brownwood, Texas is allotted to channel 245C1.

KXYL

Exhibit E, Figure 32 is an allocation study depicting the substitution of channel 245C1 at the KXYL.L antenna site. This study shows that this substitution provides clear spacing,

once KBAL at San Saba, Texas is allotted to channel 291A and channel 290C3 is substituted for channel 245C3 at Cross Plains, Texas.

AD245C3

Exhibit E, Figure 33 is an allocation study showing that channel 290C3 can be substituted for channel 245C3 at Cross Plains, Texas. The study uses the petitioner's reference coordinates for the channel 245C3 allotment.

KBAL

Exhibit E, Figure 34 is an allocation study depicting the substitution of channel 291A at the KBAL.L antenna site. This study shows that this substitution provides clear spacing, once AD291A at Mason, Texas is allotted to channel 224A or 281A.

AD224A (or AD281A)

Exhibit E, Figure 35 is an allocation study showing that channel 224A can be substituted for channel 291A at Mason, Texas. The study uses the petitioner's reference coordinates for the channel 291A allotment. This proposed substitution has been offered in previous NPRM's and presently appears in the Commission's database as substitution for channel 291A at Mason, Texas. If, for some reason unknown to BlueBonnet/WBAP, channel 224A cannot be considered as a substitute for channel 291A at Mason in the instant counterproposal, channel 281A is offered as an alternative. Exhibit E, Figure 36 is an allocation study depicting channel 281A can be allocated at Mason, once channel 245C1 is substituted at the licensed site of KXYL in Brownwood, Texas. The study also demonstrates spacing compliance with the BlueBonnet/WBAP proposed substitution of channel 281C3 for channel 277C3 at Clifton, Texas.

Blue Bonnet/WBAP Counterproposal Gain-Loss Area

Exhibit E, Figure 37 is a tabulation of the gain/loss area for each facility which requires an antenna location or class change. Stations that are proposed to have only their present channel substituted at their licensed site and require no class change are not included in this study. It is assumed that the service they would provide with a channel change would not deviate from their current operations.

The study includes seven facilities that have a deviation in their coverage area proposed by the instant counterproposal. Listed in the study is each station's loss and gain area in square kilometers and the population gains and losses in number of persons according to the U.S. Census Bureau's estimated 1999 population figures. Cumulative Study #1 includes the application class C2 for Atoka (AP276C2) as it is compared to the proposed substitution of channel 298A. It depicts a cumulative total loss area of 17,471 square kilometers and a gain area of 56,284 square kilometers. The Blue Bonnet/WBAP counterproposal (Cumulative Study #1) has a net area gain of 38,813 square kilometers.

The population loss has a cumulative loss of 367,927 persons, while the population gain is 3,345,230 persons. Therefore, the net population gain of the Blue Bonnet/WBAP counterproposal (Cumulative Study #1) is 2,977,303 persons.

Cumulative Study #2 includes the licensed class A for Atoka (KHKC) as it is compared to the proposed substitution of channel 298A. It depicts a cumulative total loss area of 14,393 square kilometers and a gain area of 56,968 square kilometers. The Blue Bonnet/WBAP counterproposal (Cumulative Study #2) has a net area gain of 42,575 square kilometers.

The population loss has a cumulative loss of 354,334 persons, while the population gain is 3,346,701 persons. Therefore, the net population gain of the Blue Bonnet/WBAP counterproposal (Cumulative Study #2) is 2,992,367 persons.

Proposed Elimination of Short-Space

The Blue Bonnet/WBAP counterproposal, if adopted, will eliminate the following existing short-spaces between various stations:

- | | |
|--|----------|
| 1) KWOW.L to KOOV, Copperas Cove, TX | 7.20 km |
| 2) KWOW.C to KOOV, Copperas Cove, TX | 5.25 km |
| 3) AP276C2, Atoka, OK to KSJR, Tulsa, OK | 3.91 km |
| AP279C1, Wilburton, OK | 3.31 km |
| 4) KDDQ, Comanche, OK to KEGL, Fort Worth, TX | 1.46 km |
| 5) KWFS, Wichita Falls, TX to AP278C3, Dickson, OK | 5.60 km. |

All of these short-spacings will be eliminated by the adoption of the Blue Bonnet/WBAP counterproposal.

Conclusion

The Blue Bonnet/WBAP counterproposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The counterproposal produces a new first local at Allen, Texas, a community of 18,309 persons (according to 1990 Census Bureau data) and an upgrade of KRPT, Anadarko, Oklahoma, to a full class C. The counterproposal (Cumulative Study #1) creates a new 60-dBu service to 31,400 square kilometers and 2,804,814 persons while eliminating six existing short-spacings. Cumulative Study #2 creates a new 60-dBu service to 37,464 square kilometers and 2,848,067 persons.

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CHANNEL 277C @ ALLEN, TEXAS [DEPICTING CHANGES REQUIRED FOR THE ALLOTMENT OF CH 277C AT ALLEN, TX] (USING PROPOSED ALLOTMENT COORDINATES AS REFERENCE)

33 33 36 N.	Class C	Search Date
96 57 35 W.	Current rules spacings	12-14-98
-----	Channel 277 -103.3 MHz	-----
Call Ch# City	State Bear' Dist' R'qrd	Margin
<hr/>		
Community of Allen	TX 151.6 56.78	
Reference Coordinates:		
North Latitude: 33-06-35		
West Longitude: 96-40-10		
KEMM 277C2 Commerce	TX 116.1 86.14 249.0	-162.86 *
KEMM.A 277A Commerce	TX 114.9 96.20 226.0	-129.80 *
Of No Concern:		
Licensed Site of Petitioner		
Change in Community of license &		
Class Change (C2 to C) Proposed		
KWFSFM 277C1 Wichita Falls	TX 284.3 151.36 270.0	-118.64 *
Of Concern:		
Substitution of Ch 272C1 Proposed		
@ NL: 34-03-57, WL: 98-45-05		
Additional Substitutions Proposed		
to Effectuate this Substitution		
AP278 278C3 Dickson	OK 357.8 68.88 176.0	-107.12 *
ALOPEN 278C3 Dickson	OK 358.1 69.61 176.0	-106.39 *
AP278 278C3 Dickson	OK 355.4 69.89 176.0	-106.11 *
AP278 278C3 Dickson	OK 350.6 69.96 176.0	-106.04 *
AP278 278C3 Dickson	OK 350.6 69.96 176.0	-106.04 *
Of Concern:		
Substitution of Ch 224A Proposed		
@ NL: 34-07-17, WL: 96-58-49		
See Statements of Petitioner & Dickson, OK Applicants		
ALOPEN 276C2 Atoka	OK 40.3 117.92 188.0	-70.08 *
KHKCFM 276C2 Atoka	OK 36.7 118.89 188.0	-69.11 *
KHKCFM 276A Atoka	OK 36.8 118.80 165.0	-46.20 *
Of Concern:		
Substitution of Ch 298A Proposed		
@ NL: 34-28-57, WL: 96-05-06		
See Statements with KHKC Licensee		

Continued on next page

EXHIBIT E, FIGURE 1

Continued from previous page

33 33 36 N.				Class C				Search Date
96 57 35 W.				Current rules spacings				12-14-98
----- Channel 277 -103.3 MHz -----								
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin	
KWOW	277C3	Clifton		TX	193.3	201.22	237.0	-35.78 *
KWOW.C	277C3	Clifton		TX	189.5	205.24	237.0	-31.76 *
Of Concern: Substitution of Ch 281C3 Proposed Additional Substitutions Proposed to Effectuate this Substitution See Statement with KWOW Licensee								
KVILFM	279C	Highland Park-Dal		TX	180.4	107.73	105.0	2.73 *
KDMX	275C	Dallas		TX	180.8	108.51	105.0	3.51 *
KVILFM	279C	Highland Park-Dal		TX	180.8	108.51	105.0	3.51 *
KVILFM	279C	Highland Park-Dal		TX	180.8	108.51	105.0	3.51 *
KJSR	277C	Tulsa		OK	23.6	297.76	290.0	7.76 *
KRPT.P	278C	Anadarko		OK	322.9	254.21	241.0	13.21
Of Note: Substitution and upgrade proposed In instant counterproposal at NL: 35-23-18 WL: 98-37-41								
AD274	274A	Roxton		TX	88.5	119.40	95.0	24.40
DE274	274A	Roxton		TX	88.5	119.40	95.0	24.40
KXALFM	276C3	Pittsburg		TX	112.6	202.98	176.0	26.98
KZRB	278C2	New Boston		TX	94.3	216.55	188.0	28.55
AD274	274A	Soper		OK	65.9	128.28	95.0	33.28
KJCS	277C1	Nacogdoches		TX	135.6	307.18	270.0	37.18
KXALFM	276A	Pittsburg		TX	112.6	202.98	165.0	37.98
KJCS.C	277C1	Hudson		TX	139.5	310.10	270.0	40.10

**Allotment of CH277C
at Allen, TX
MM Docket 98-198
Blue Bonnet Radio, Inc.**

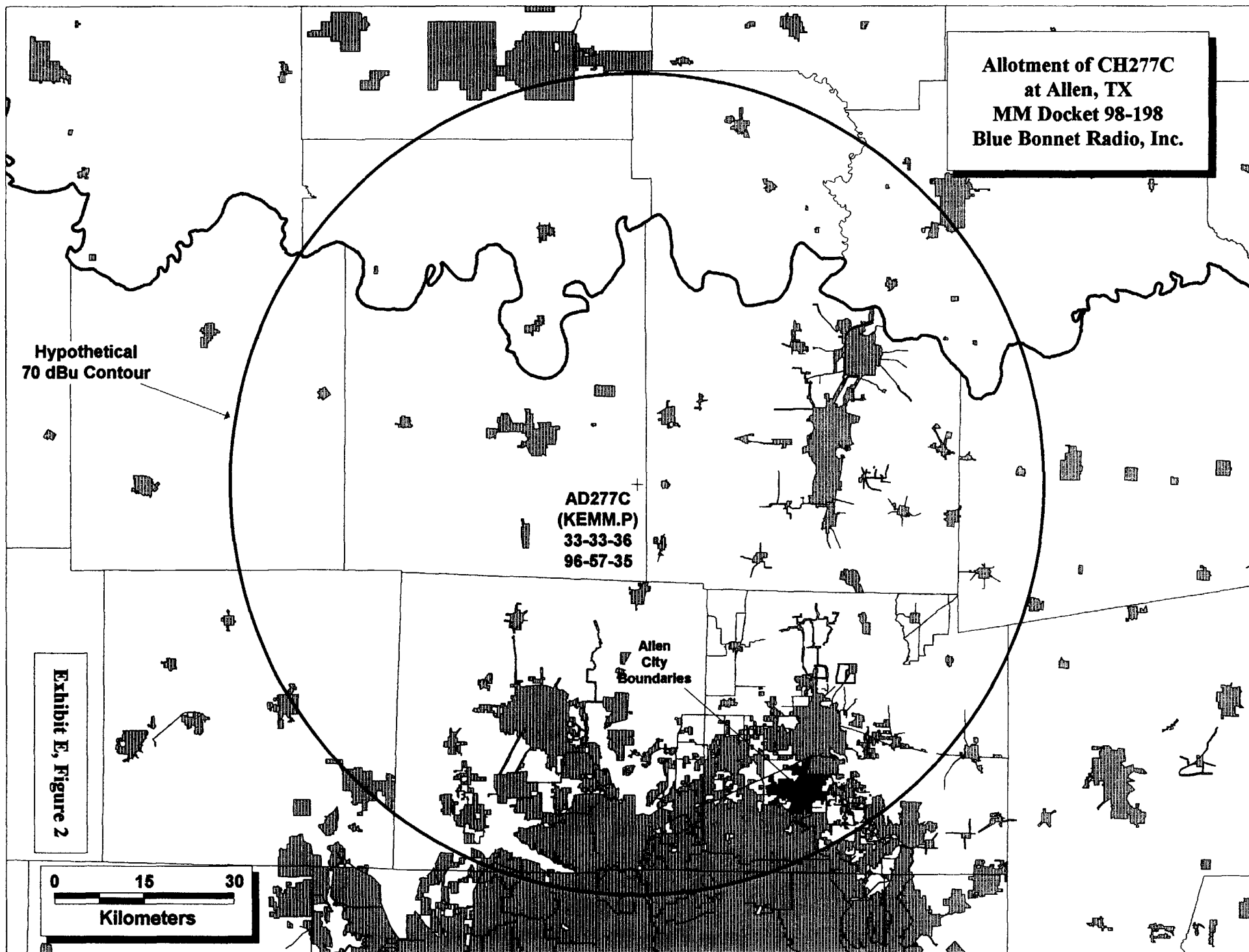
Hypothetical
70 dBu Contour

AD277C
(KEMM.P)
33-33-36
96-57-35

Allen
City
Boundaries

Exhibit E, Figure 2

0 15 30
Kilometers



Loss Area = 4,381 sq km
Gain Area = 22,470 sq km
Pop. Loss = 298,692
Pop. Gain = 2,928,528

Allotment of CH277C
at Allen, TX
Gain/Loss Study
MM Docket 98-198
Blue Bonnet Radio, Inc.

KEMM.P
60 dBu
Contour

GAIN

AD277C
(KEMM.P)
33-33-36
96-57-35

KEMM.L
33-13-06
96-07-42

LOSS

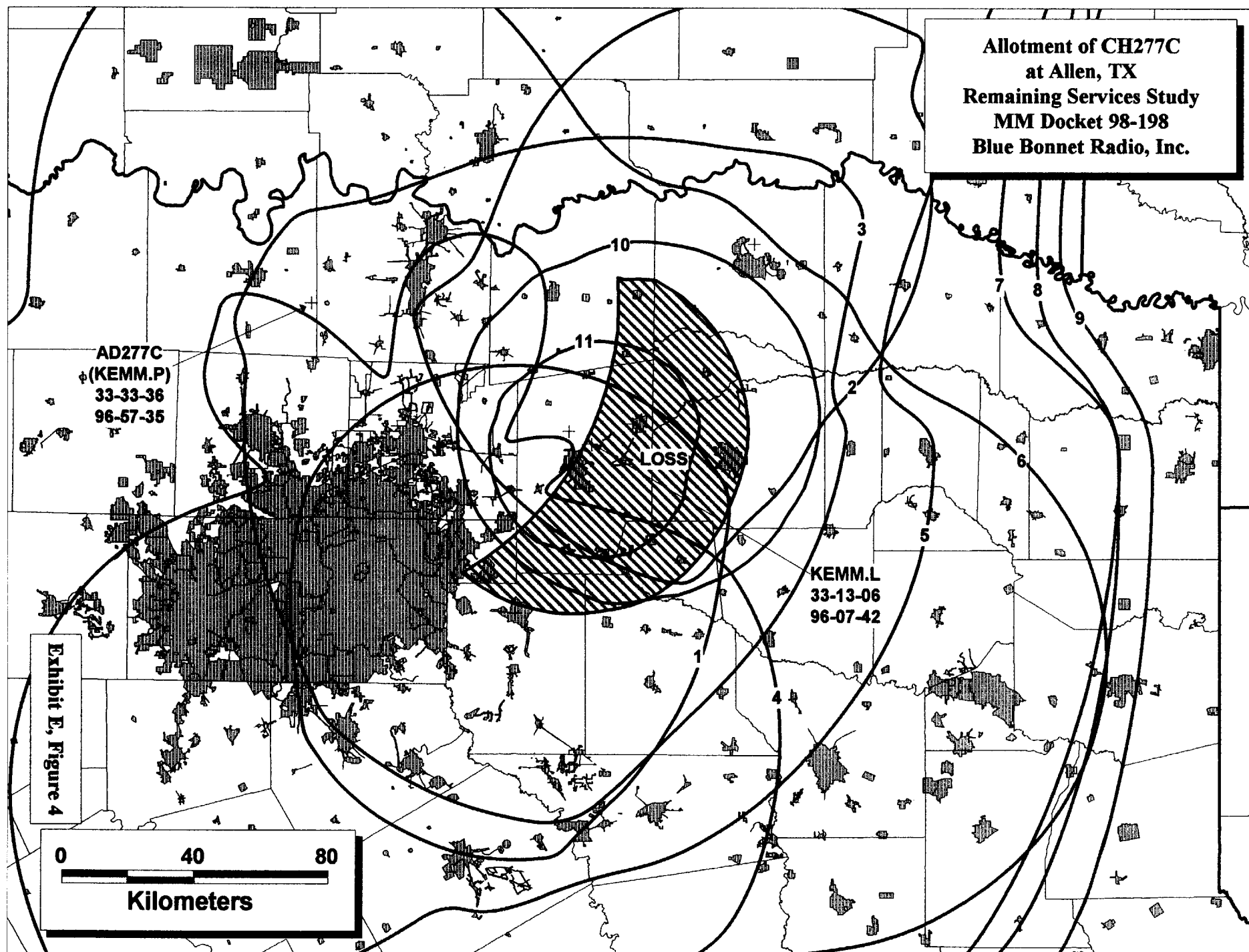
KEMM.L
60 dBu
Contour

Exhibit E, Figure 3

0 20 40

Kilometers

**Allotment of CH277C
at Allen, TX
Remaining Services Study
MM Docket 98-198
Blue Bonnet Radio, Inc.**



Engineering Statement

In Support of a

Counterproposal

MM Docket 98-198

**Blue Bonnet Radio, Inc.
WBAP/KSCS Operation, Ltd.**

Stations included in Remaining Services Study

<u>Contour Number</u>	<u>Call Letters</u>	<u>City of License</u>	<u>Frequency</u>
1	KPYK-AM	Terrell, Texas	1570
2	KGDD-AM	Paris, Texas	1250
3	KGVL-AM	Greenville, Texas	1400
4	KPBC-AM	Garland, Texas	770
5	KAAM-AM	Plano, Texas	620
6	KOOO-AM	Dallas, Texas	1190
7	KSKY-AM	Balch Springs, Texas	660
8	KRLD-AM	Dallas, Texas	1080
9	WBAP-AM	Fort Worth, Texas	820
10	KETR-FM	Commerce, Texas	88.9
11	KIKT-FM	Greenville, Texas	93.5

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CH 272C1 (KWFS) WICHITA FALLS, TX [DEPICTING SITE & CHANNEL CHANGES NEEDED FOR SUBSTITUTION OF CH 272C1] (USING REQUESTED ALLOTMENT SITE AS REFERENCE)

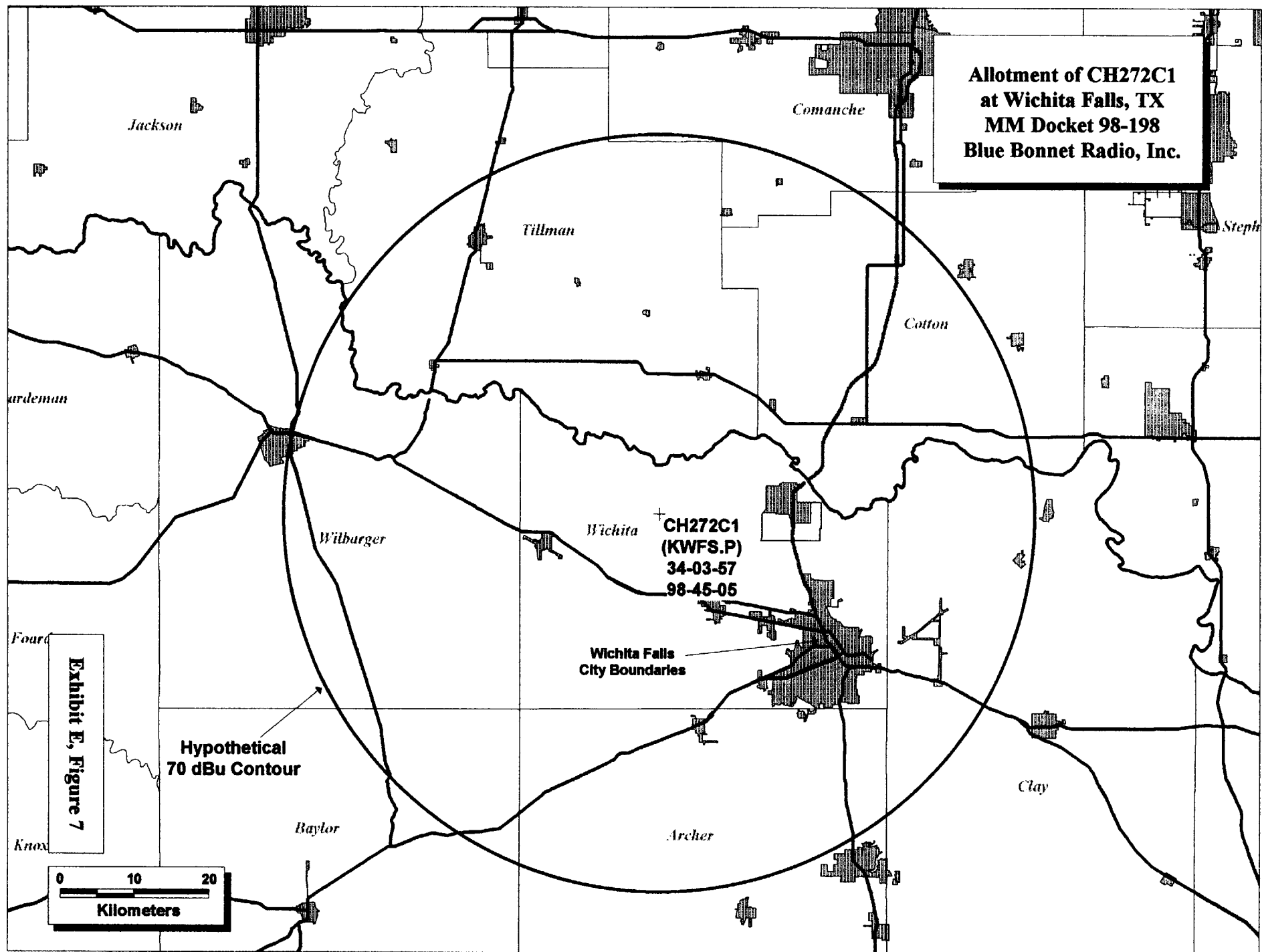
34 03 57 N.	Class C1				Search Date	
98 45 05 W.	Current rules spacings				12-14-98	
-----		Channel	272 -102.3 MHz	-----		
Call	Ch#	City	State	Bear'	Dist'	R'qrd
Margin						
Community of Wichita Falls			TX	130.6	28.60	
Reference Coordinates:						
North latitude: 33-53-53						
West Longitude: 98-30-59						
KVWCFM 272A Vernon			TX	281.5	48.75	200.0 -151.25 *
Of Concern:						
Substitution of Ch 276A proposed						
@ licensed site after substitution						
of Ch 272C1 for Ch 277C1 (KWFS)						
KKENFM 272A Duncan			OK	55.5	87.47	200.0 -112.53 *
Of Concern:						
Substitution of Ch 246A proposed						
@ licensed site after substitution						
of Ch 287A for Ch 246A (KDDQ)						
KQXC	273A	Wichita Falls	TX	129.2	21.79	133.0 -111.21 *
Of Concern:						
Substitution of Ch 280A proposed						
@ licensed site after substitution						
of Ch 278C for Ch 279C1 (KRPT)						
KMADFM	272A	Madill	OK	88.6	182.46	200.0 -17.54 *
DE272	272A	Madill	OK	88.6	182.46	200.0 -17.54 *
Of No Concern:						
Ch 272A deleted & Ch 273A substituted						
in MM Docket 95-126. Form 302 filed						
for operation on Ch 273A.						

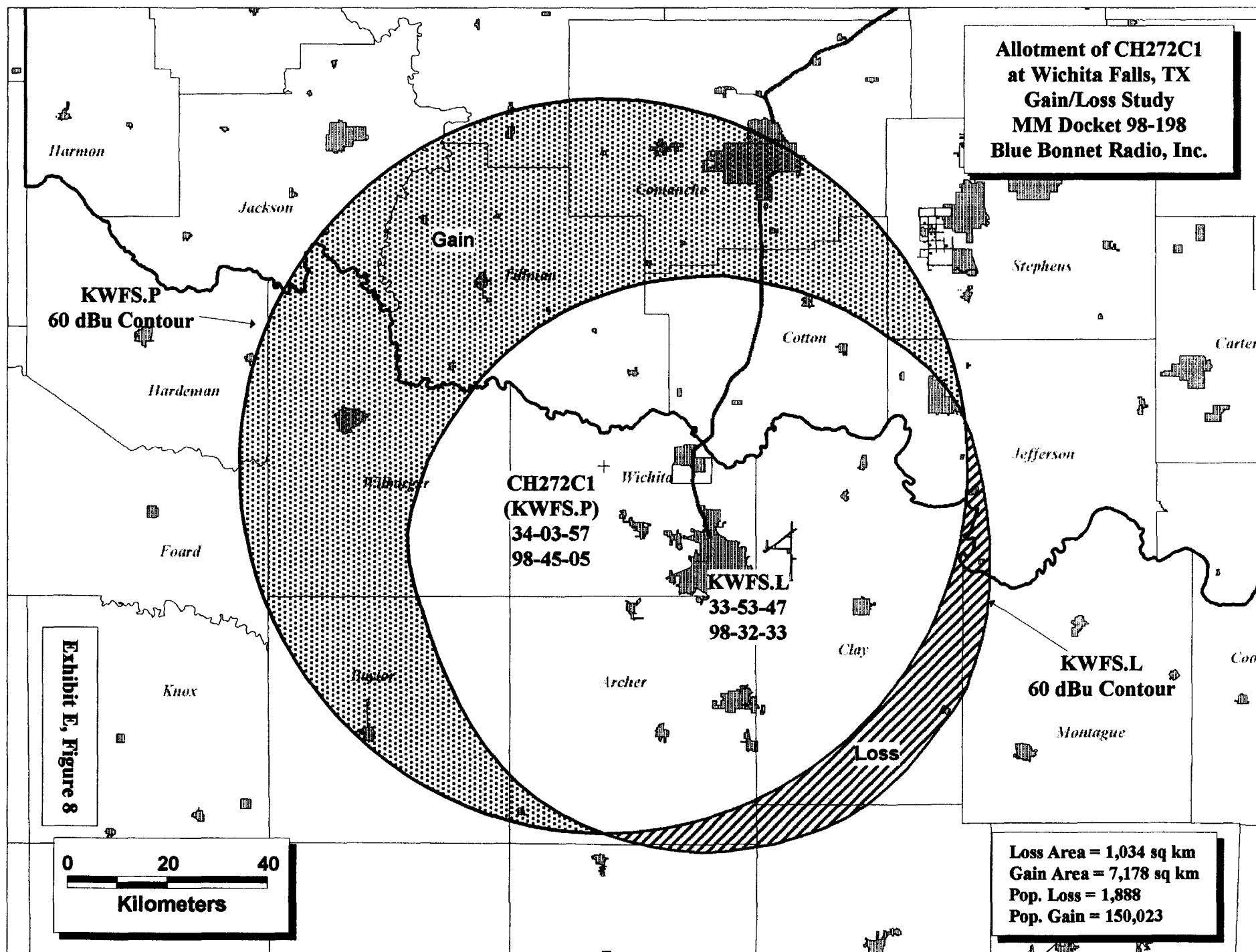
Continued on next page

EXHIBIT E, FIGURE 6

Continued from previous page

34 03 57 N.				Class C1				Search Date
98 45 05 W.				Current rules spacings				12-14-98
----- Channel 272A -102.3 MHz -----								
Call	Ch#	City	Channel	State	Bear'	Dist'	R'qrd	Margin
KSYE	218C1	Frederick		OK	347.0	34.00	34.0	0.00 *
ALOPEN	269C	Azle		TX	128.1	121.73	105.0	16.73
KTXQ	271C	Fort Worth-Dallas		TX	134.9	233.32	209.0	24.32
AD273	273C2	Madill		OK	94.6	182.97	158.0	24.97
KMADFM	273C2	Madill		OK	94.6	182.97	158.0	24.97
ALOPEN	273C2	Madill		OK	98.3	184.30	158.0	26.30
AD273	273C2	Whitesboro		TX	98.3	184.30	158.0	26.30
KJKB.C	269A	Jacksboro		TX	150.7	106.46	75.0	31.46
KMADFM	273A	Madill		OK	88.6	182.46	133.0	49.46
DE273	273A	Madill		OK	88.6	182.46	133.0	49.46
DE273	273A	Madill		OK	88.6	182.46	133.0	49.46
AD273	273A	Madill		OK	88.6	182.46	133.0	49.46





ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CH 276A (KVWC) VERNON, TX
[DEPICTING CH 276A CAN BE SUBSTITUTED FOR CH 272A AFTER 272C1 IS
SUBSTITUTED FOR CH 277C1 @ KWFS]
(USING KVWC LICENSED SITE AS REFERENCE)

34 09 12 N.				Class A				Search Date
99 16 09 W.				Current rules spacings				12-14-19
----- Channel 276 -103.1 MHz -----								
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
<hr/>								
KWFS	272C1	Wichita Falls		TX	101.5	48.75		
Of Note: New reference for KWFS on Ch 272C1. No spacing concern								
KWFSFM	277C1	Wichita Falls		TX	113.0	72.92	133.0	-60.08 *
Of Concern: Substitution of Ch 272C1 proposed in instant counterproposal. See KWFS on Ch 272C1 above.								
KQXC	273A	Wichita Falls		TX	109.9	68.81	31.0	37.81
Of Note: Substitution of Ch 280A proposed								
KRPTFM	279C1	Anadarko		OK	43.1	119.86	75.0	44.86
KRPT	278C	Anadarko		OK	202.8	149.22	95.00	54.22
Of Note: Substitution proposed in instant Counterproposal								
<hr/>								

EXHIBIT E, FIGURE 9

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CH 246A (KKEN) DUNCAN, OK
[DEPICTING CH 246 CAN BE SUBSTITUTED FOR CH 272A WHEN CH 287A
IS SUBSTITUTED FOR CH 246A AT COMANCHE, OK]
(USING KKEN LICENSED COORDINATES AS REFERENCE)

34 30 43 N.				Class A				Search Date
97 58 05 W.				Current rules spacings				12-14-98
----- Channel 246 - 97.1 MHz -----								
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
<hr/>								
KDDQ.C 246A	Comanche			OK	148.8	9.76	115.0	-105.24 *
Of Concern: Substitution of Ch 287A proposed with site change.								
KDDQ 244A	Comanche			OK	148.8	9.76	31.0	-21.24 *
Of No Concern: Previous licensed channel of KDDQ. Changed to Ch 246A in MM Docket 96-10								
KNID.C 245C	Enid			OK	8.7	164.82	165.0	-0.18 *
KWEYFM 247C1	Weatherford			OK	328.8	134.72	133.0	1.72 *
KEGL.C 246C	Fort Worth			TX	156.5	232.66	226.0	6.66 *
KEGL 246C	Fort Worth			TX	156.3	234.22	226.0	8.22 *
AD249 249C3	Healdton			OK	119.1	50.34	42.0	8.34 *
KMMY 246C	Muskogee			OK	69.8	247.84	226.0	21.84
DE249 249C3	Pauls Valley			OK	71.8	68.10	42.0	26.10
KGOKFM 249C3	Pauls Valley			OK	71.8	68.10	42.0	26.10
KNKI.C 244C	Flower Mound			TX	159.5	127.33	95.0	32.33
ALOPEN 246A	Eldorado			OK	268.4	154.39	115.0	39.39

EXHIBIT E, FIGURE 10

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, INC.

ALLOCATION STUDY - CH 287A (KDDQ) COMANCHE, OK [DEPICTING SITE, CHANNEL & OTHER STATION (KYYI) CHANGE FOR KDDQ USE OF CH 287A] (USING PROPOSED ALLOTMENT SITE AS REFERENCE)

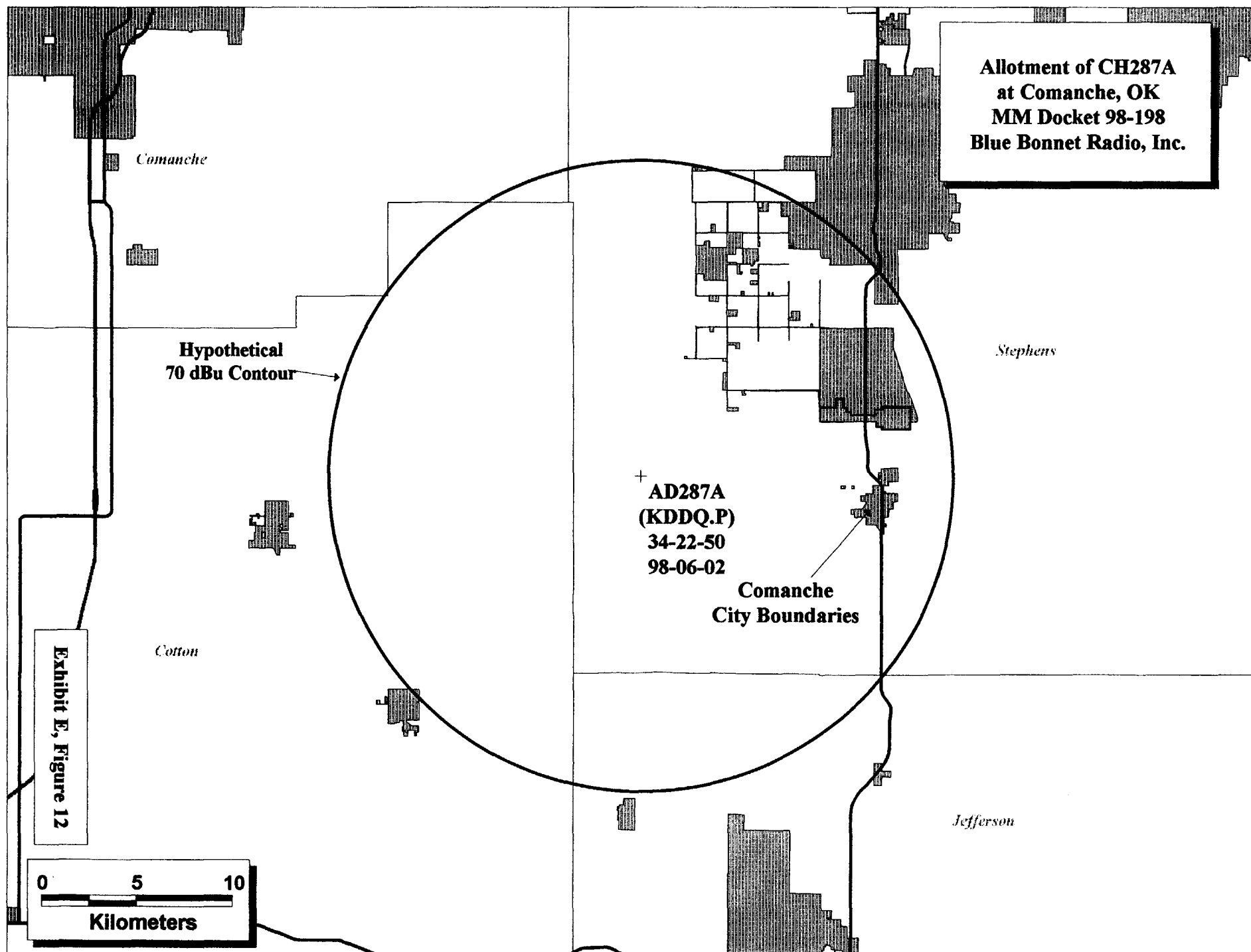
34 22 50 N.				Class A				Search Date
98 06 02 W.				Current rules spacings				12-14-98
-----				Channel 287 -105.3 MHz	-----			
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
Community of Comanche				OK	96.2	12.31		
Reference Coordinates:								
North latitude: 34-22-07								
West Longitude: 97-58-03								
KYYI 284C	Burkburnett			TX	246.0	78.48	95.0	-16.52 *
Of Concern:								
See Statement to Accept CP								
Facility & Site								
See KYYI CP Site Shown Below								
KYNG	287C	Dallas		TX	152.0	225.51	226.0	-0.49 *
KTUZ	288A	Chickasha		OK	12.5	71.58	72.0	-0.42 *
KYYI.C 284C1	Burkburnett			TX	246.0	78.48	75.0	3.48 *
Of Note:								
Existing CP for KYYI								
discussed above.								
KBLP	286A	Lindsay		OK	40.4	75.70	72.0	3.70 *
KRNB.C	289C	Decatur		TX	155.8	120.83	95.0	25.83
KRNB	289C	Decatur		TX	155.8	120.83	95.0	25.83
KRNB.C	289C	Decatur		TX	155.8	120.83	95.0	25.83
KQTZ	290C	Hobart		OK	296.4	122.16	95.0	27.16
AP287	287A	Kingfisher		OK	7.0	150.44	115.0	35.44
AP287	287A	Kingfisher		OK	8.0	151.07	115.0	36.07

Continued on next page

EXHIBIT E, FIGURE 11

Continued from previous page

34 22 50 N.				Class A				Search Date
98 06 02 W.				Current rules spacings				12-14-98
-----	-----	-----	Channel	287 -105.3 MHz	-----	-----	-----	-----
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
KLSRFM	287C1	Memphis		TX	283.1	236.78	200.0	36.78
ALOPEN	287A	Kingfisher		OK	5.1	155.40	115.0	40.40



**Allotment of CH287A
at Comanche, OK
Gain/Loss Study
MM Docket 98-198
Blue Bonnet Radio, Inc.**

**KDDQ.L
60 dBu Contour**

**Hypothetical
60 dBu Contour**

Gain

Loss

**AD287A
(KDDQ.P)
34-22-50
98-06-02**

**KDDQ.L
34-26-12
97-54-47**

Jefferson

Comanche

Exhibit E, Figure 13

0 10 20
Kilometers

**Loss Area = 540 sq km
Gain Area = 1,357 sq km
Pop. Loss = 2,738
Pop. Gain = 9,678**

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.
WBAP/KSCS OPERATING, LTD

CHANNEL SPACING STUDY - CH 284C1 (KYYI) BURKBURNETT, TX [DEPICTING CLEAR SPACING FOR KYYI @ CP SITE] & ITS SPACING TO KDDQ ON CH 287A @ COMANCHE, OK] (USING KYYI CP SITE AS REFERENCE)

34 05 35 N.			Class C1				Search Date
98 52 44 W.			Current rules spacings				12-14-98
-----			Channel 284 -104.7 MHz	-----			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
Community of Burkburnett			TX	93.0	29.04		
Reference Coordinates:							
North Latitude: 34-04-45							
West Longitude: 98-33-53							
KYYI 284C Burkburnett			TX	0.0	0.00	270.0	-270.00 *
Of No Concern:							
Licensed Site of KYYI							
Before issuance of class C1 CP							
KYYI.C 284C1 Burkburnett			TX	0.0	0.00	245.0	-245.00 *
Of Concern:							
CP Site of KYYI							
as of class C1							
KYYI 284C Burkburnett			TX	120.4	33.22	270.0	-236.78 *
Of No Concern:							
Auxiliary Site of KYYI							
KDDQ.P 287A Comanche			OK	66.0	78.48	75.0	3.48 *
Of Note:							
Proposed Allotment Reference of							
Ch 287A for KDDQ @ Comanche.							
NL; 34-22-50, WL; 98-06-02							
See KDDQ Study							
ALOPEN 285C1 Pilot Point			TX	108.4	187.24	177.0	10.24
KTCY.A 285C1 Pilot Point			TX	108.4	187.24	177.0	10.24
AD282 282C2 Olney			TX	179.4	105.00	79.0	26.00

Continued on next page

EXHIBIT E, FIGURE 14

Continued from previous page

34 05 35 N.			Class C1					Search Date
98 52 44 W.			Current rules spacings					12-14-98
-----	-----	-----	Channel	284	-104.7	MHz	-----	-----
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin	
KTCY	285C2	Pilot Point	TX	108.4	187.24	158.0	29.24	
KZCD	231C2	Lawton	OK	31.7	59.57	27.0	32.57	
KKDAFM	283C	Dallas	TX	133.3	243.39	209.0	34.39	
KKDAFM	283C	Dallas	TX	133.2	243.74	209.0	34.74	
AD283	283A	Pauls Valley	OK	64.8	168.55	133.0	35.55	

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.
WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CHANNEL 280A (KQXC) WICHITA FALLS, TX [DEPICTING CHANGES REQUIRED FOR THE ALLOTMENT OF CH 280A AT WICHITA FALLS, TX] (USING KQXC LICENSED SITE AS REFERENCE)

33 56 30 N.				Class				Search Date
98 34 07 W.				Current rules spacings				12-14-98
-----				Channel 280A -103.9 MHz	-----			
Call	Ch#	City		State	Bear'	Dist'	R'grd	Margin
<hr/>								
KWFSFM 277C1 Wichita Falls				TX	154.3	5.57	75.0	-69.43 *
Of Concern:								
Substitution of Ch 272C1								
proposed in instant counterproposal								
See KWFS Ch 272C1 study								
KRPTFM 279C1 Anadarko				OK	9.1	112.33	133.0	-20.67 *
Of Concern:								
Substitution of Ch 278C								
proposed in instant counterproposal								
See KRPT Ch 278C study								
KCDD	279C	Hamlin		TX	226.1	194.40	165.0	29.40
ALOPEN	282C2	Olney		TX	197.4	92.45	55.0	37.45
KMGL	281C	Oklahoma City		OK	29.0	203.95	165.0	38.95
KXZN	281C3	Sanger		TX	115.5	133.39	89.0	44.39
KVILFM	279C	Highland Park-Dal		TX	135.2	211.56	165.0	46.56
KVILFM	279C	Highland Park-Dal		TX	135.5	211.62	165.0	46.62
KVILFM	279C	Highland Park-Dal		TX	135.5	211.62	165.0	46.62
KRPT 278C Anadarko				OK	358.1	160.67	95.0	65.57
Of Note:								
Ch 278C upgrade reference site								

EXHIBIT E, FIGURE 15

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.
WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CH 278C (KRPT) ANADARKO, OK [DEPICTING SUBSTITUTIONS REQUIRED FOR UPGRADE OF KRPT ON CH 278C] (USING PROPOSED CH 278C ALLOTMENT SITE AS REFERENCE)

35 23 18 N.			Class C			Search Date
98 37 41 W.			Current rules spacings			12-14-98
-----	Channel	278	-103.5 MHz	-----		
Call	Ch#	City	State	Bear'	Dist'	R'qrd Margin
<hr/>						
Community of Anadarko			OK	135.6	49.99	
Reference Coordinates:						
North Latitude: 35-03-58						
West Longitude: 98-14-39						
KRPTFM 279C1 Anadarko			OK	155.1	54.61	209.0 -154.39 *
Of No Concern:						
Licensed site of KRPT						
on Ch 279C1						
AP278 278C1 Alva			OK	352.6	131.73	270.0 -138.27 *
ALOPEN 278C1 Alva			OK	350.6	134.23	270.0 -135.77 *
Of Concern:						
Substitution of Ch 248C2 proposed						
@ NL: 36-58-32, WL: 98-42-21						
AD278 278C3 Wellington			TX	246.8	160.03	237.0 -76.97 *
ALOPEN 278C3 Wellington			TX	246.8	160.03	237.0 -76.97 *
Of Concern:						
Substitution of Ch 298C3 proposed						
@ allotment site						
KWFSFM 277C1 Wichita Falls			TX	177.3	165.69	209.0 -43.31 *
Of Concern:						
Substitution of Ch 272C1 proposed						
@ NL: 34-03-57, WL: 98-45-05						
AP278 278C3 Dickson			OK	133.4	194.64	237.0 -42.36 *
AP278 278C3 Dickson			OK	133.4	194.64	237.0 -42.36 *
AP278 278C3 Dickson			OK	132.2	198.41	237.0 -38.59 *
ALOPEN 278C3 Dickson			OK	131.5	200.98	237.0 -36.02 *
AP278 278C3 Dickson			OK	131.8	201.21	237.0 -35.79 *
Of Concern:						
Substitution of Ch 224A proposed						
@ NL: 34-07-17, WL: 96-58-49						

Continued on next page

EXHIBIT E, FIGURE 16

Continued from previous page

35 23 18 N.			Class C				Search Date
98 37 41 W.			Current rules spacings				12-14-98
-----	Channel	278	-103.5	MHz	-----		
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin

KMGL	281C	Oklahoma City	OK	80.2	104.98	105.0	-0.02 *
------	------	---------------	----	------	--------	-------	---------

KEMM.P	277C	Allen	TX	142.9	254.21	241.0	13.21
--------	------	-------	----	-------	--------	-------	-------

Of Note:
 Allotment of CH277C at Allen, TX
 Proposed in instant counterproposal
 NL: 33-33-36
 WL: 96-57-35

KOFM.C	276C2	Enid	OK	27.0	137.45	105.0	32.45
--------	-------	------	----	------	--------	-------	-------

KOFM	276C3	Enid	OK	28.7	132.70	96.0	36.70
------	-------	------	----	------	--------	------	-------

KJSR	277C	Tulsa	OK	75.4	277.88	241.0	36.88
------	------	-------	----	------	--------	-------	-------

**Allotment of CH278C
at Anadarko, OK
MM Docket 98-198
Blue Bonnet Radio, Inc.**

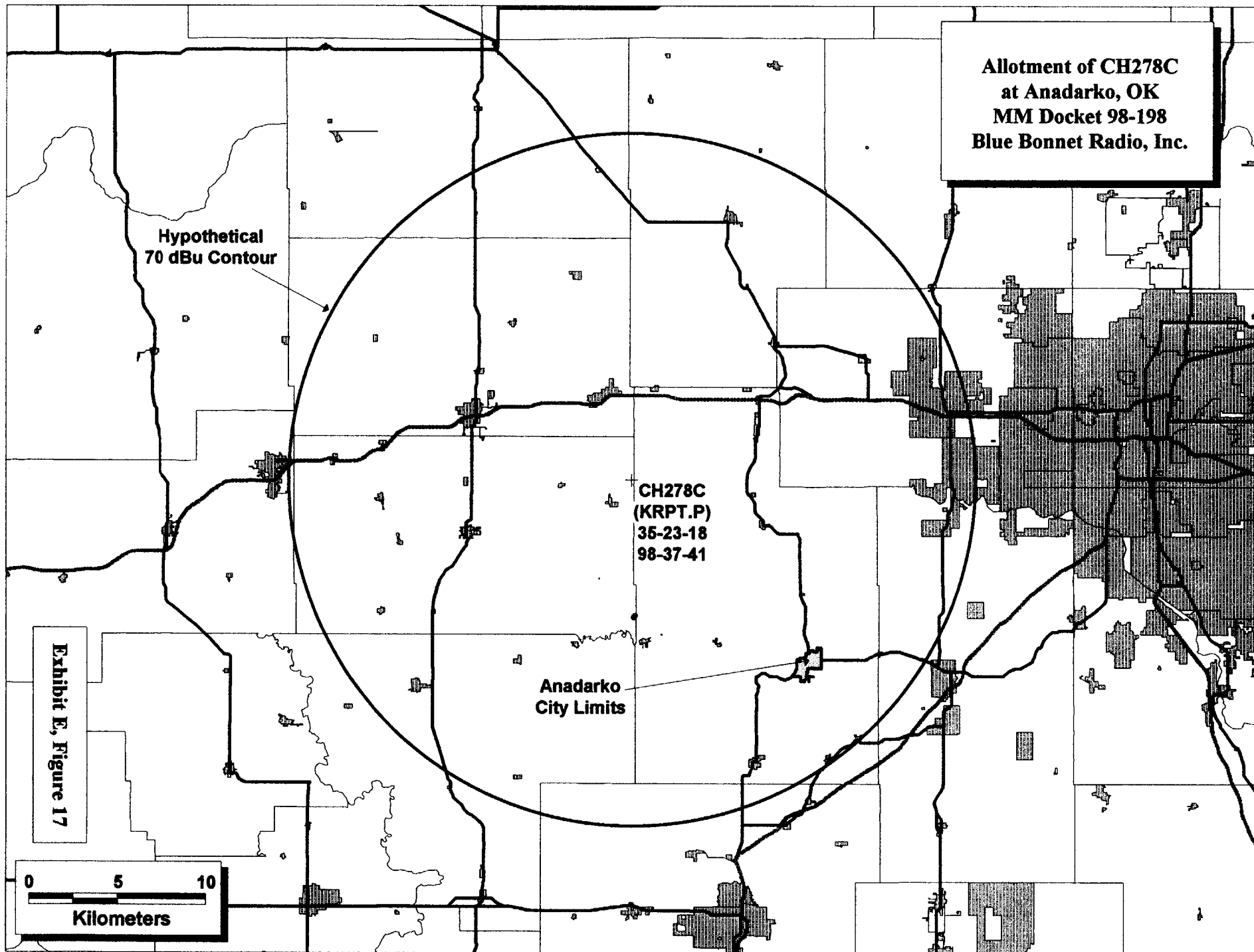
**Hypothetical
70 dBu Contour**

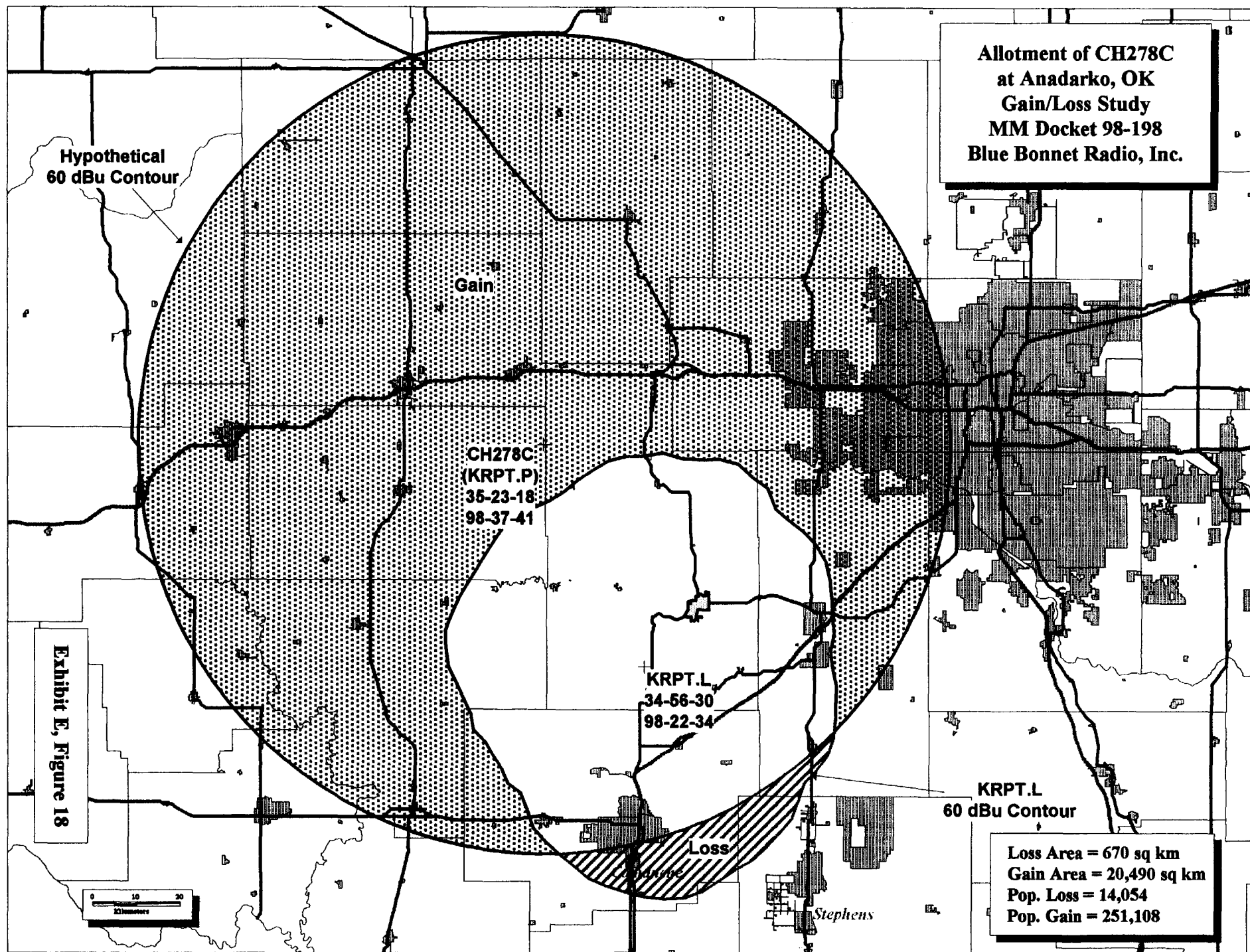
**CH278C
(KRPT.P)
35-23-18
98-37-41**

**Anadarko
City Limits**

Exhibit E, Figure 17

**0 5 10
Kilometers**





ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

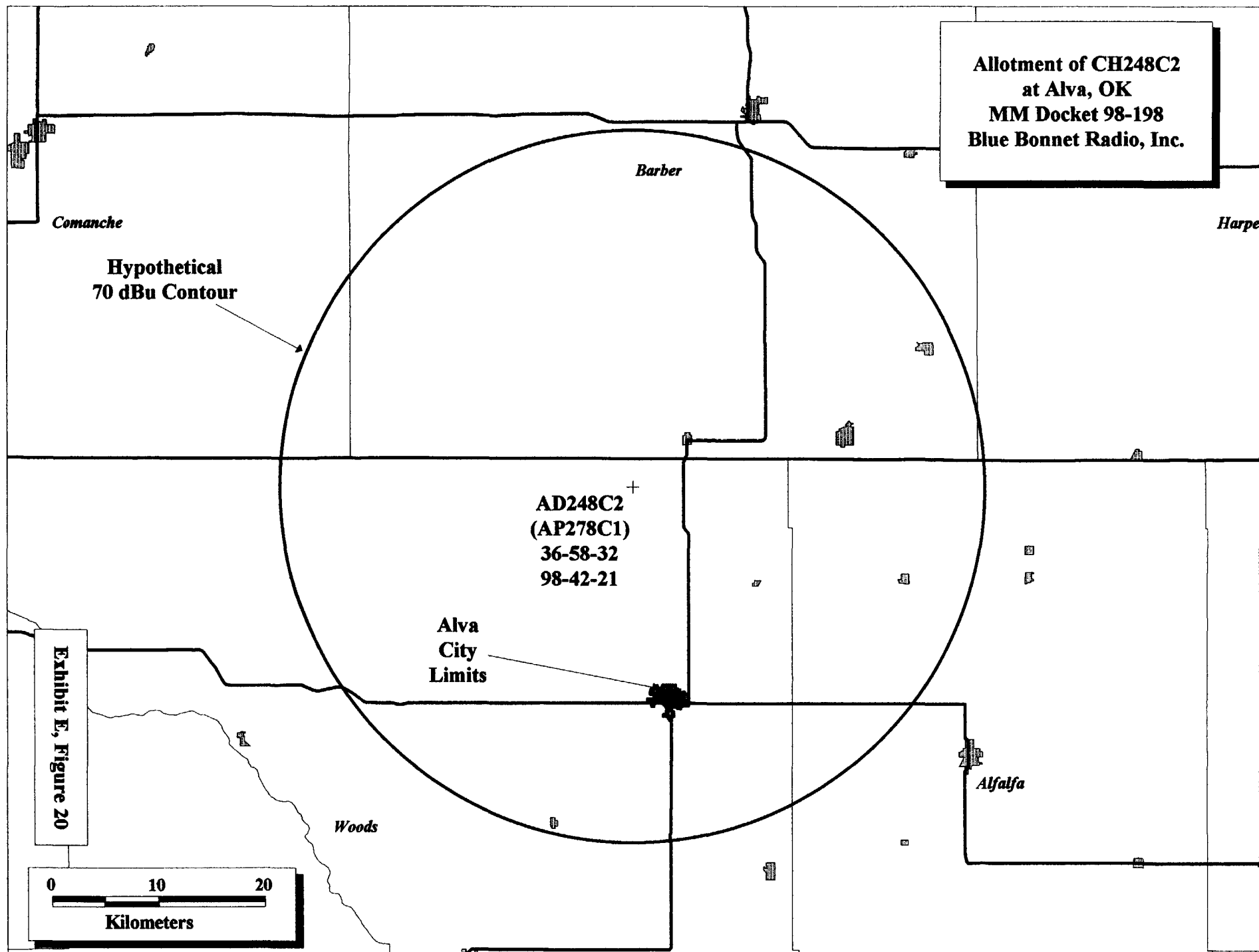
ALLOCATION STUDY – CHANNEL 248C2 (AP 278C1) ALVA, OK

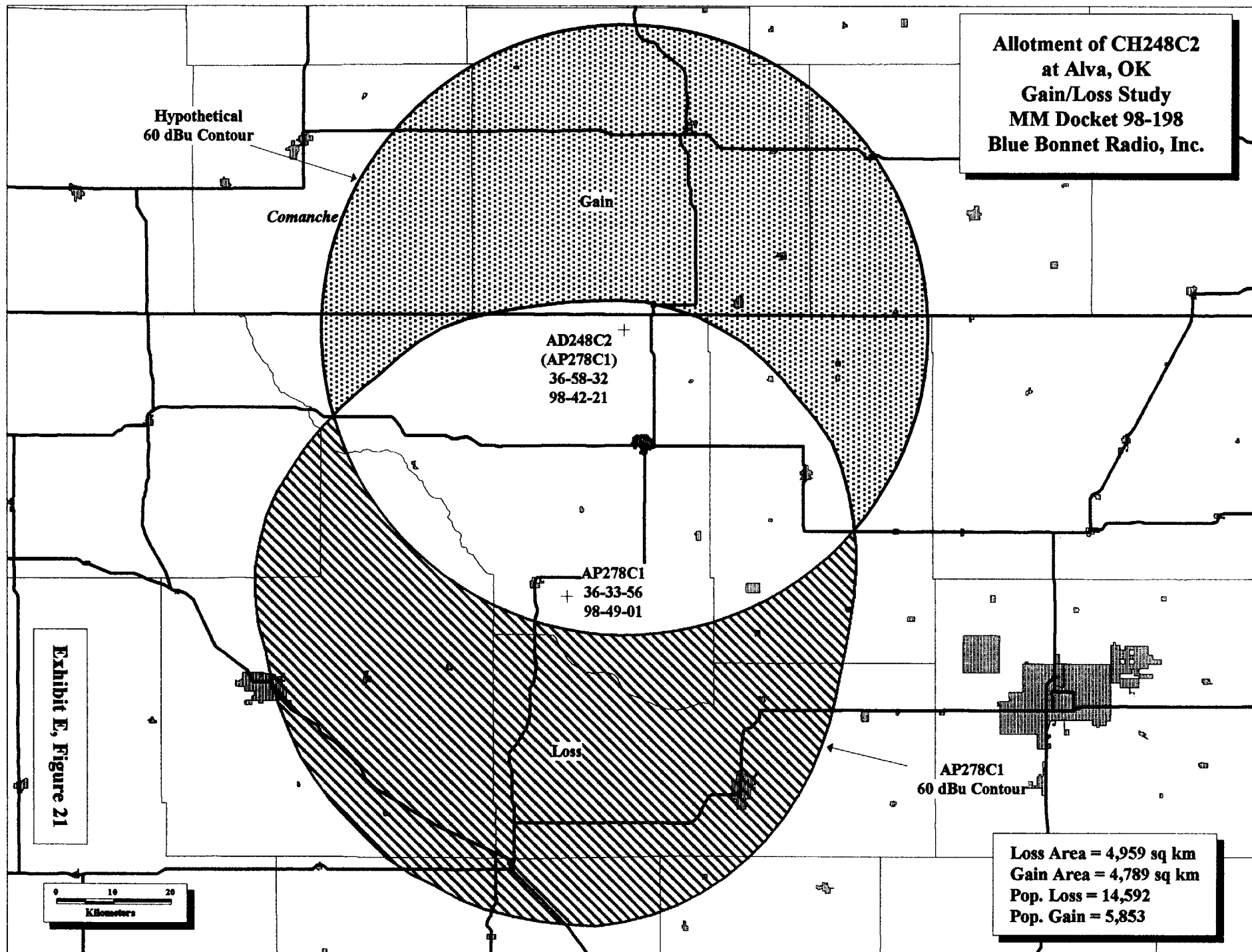
[DEPICTING SPACING FOR CH 248C2 SUBSTITUTION AT ALVA]

(USING PROPOSED ALLOTMENT COORDINATES AS REFERENCE)

36 58 32 N.			Class C2				Search Date
98 42 21 W.			Current rules spacings				12-14-98
-----			Channel 248 - 97.5 MHz	-----			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
Community of Alva			OK	169.9	19.57		
Reference Coordinates:							
North Latitude: 36-48-07							
West Longitude: 98-40-02							
KMODFM	248C	Tulsa	OK	110.3	248.89	249.0	-0.11 *
KNID	245C1	Enid	OK	128.1	78.91	79.0	-0.09 *
KWEYFM	247C1	Weatherford	OK	180.9	158.14	158.0	0.14 *
KKJQ	247C1	Garden City	KS	299.9	179.19	158.0	21.19
KRBB	250C	Wichita	KS	49.9	138.35	105.0	33.35
KNID.C	245C	Enid	OK	140.6	142.82	105.0	37.82

EXHIBIT E, FIGURE 19





ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CHANNEL 298C3 (AL 278C3) WELLINGTON, TX [DEPICTING SPACING FOR SUBSTITUTION OF CH 298C3 FOR CH 278C3 @ WELLINGTON] (USING CH 278C3 ALLOTMENT COORDINATES AS REFERENCE)

34 49 13 N.			Class C3				Search Date	
100 14 29 W.			Current rules spacings				12-14-98	
-----			Channel	298	-107.5	MHz	-----	
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
<hr/>								
KEYB.C	300C2	Altus		OK	94.9	64.52	56.0	8.52 *
KEYB	300A	Altus		OK	104.1	82.93	42.0	40.93
KSCBFM	298C1	Liberal		KS	342.5	258.89	211.0	47.89
KCLIFM	295C1	Clinton		OK	57.3	135.79	76.0	59.79
KVRW	297C2	Lawton		OK	97.5	181.78	117.0	64.78
<hr/>								

EXHIBIT E, FIGURE 22

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

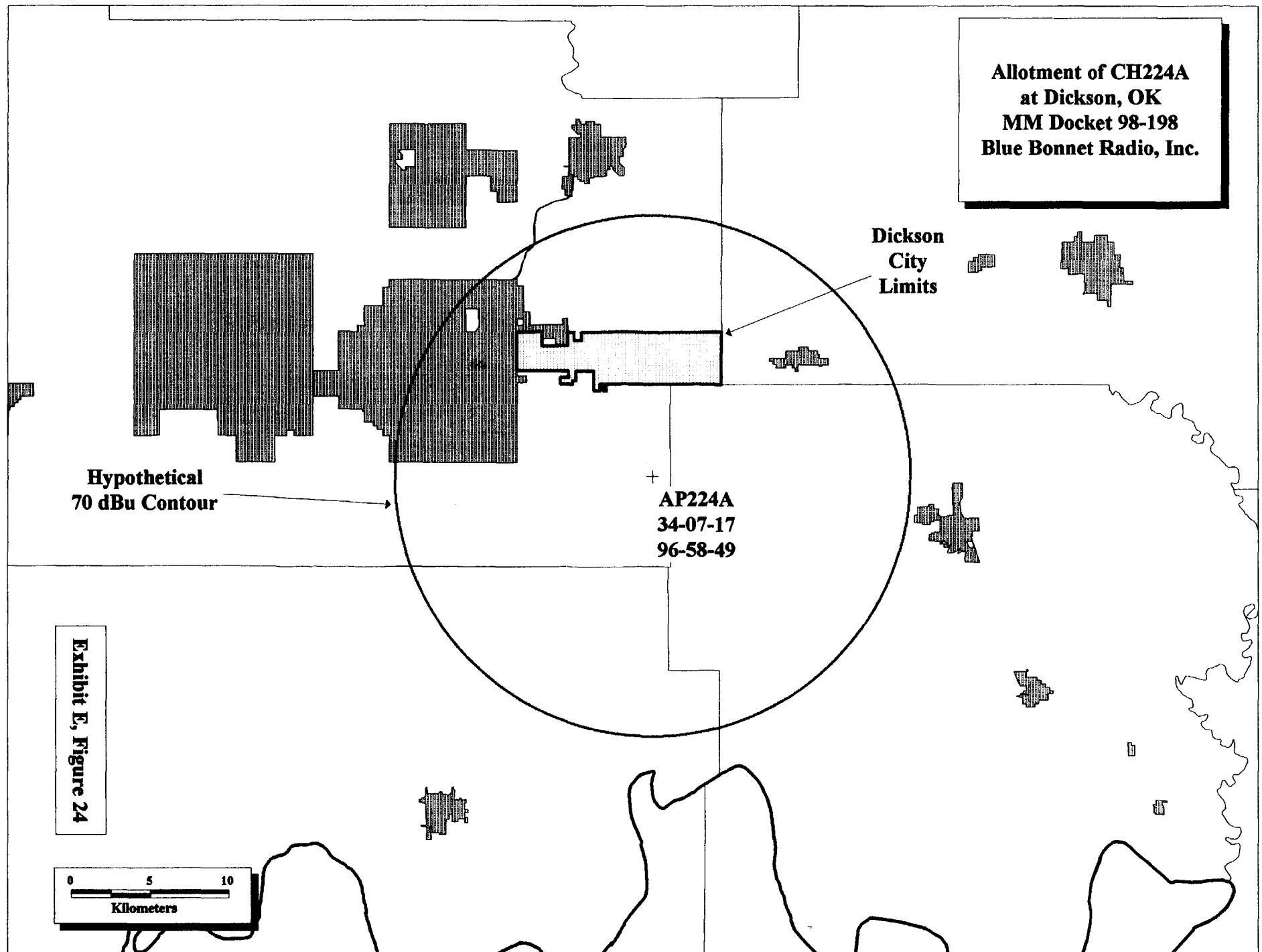
WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CHANNEL 224A (AL & APP 278C3) DICKSON, OK [DEPICTING SPACING FOR SUBSTITUTION OF CH 224A FOR CH 278A AT DICKSON, OK] (USING PROPOSED CH 224A ALLOTMENT COORDINATES AS REFERENCE)

34 07 17 N.			Class A			Search Date
96 58 49 W.			Current rules spacings			12-14-98
-----			Channel 224A - 92.7 MHz	-----		
Call	Ch#	City	State	Bear'	Dist'	R'qrd Margin
Community of Dickson			OK	350.3	7.57	
Reference Coordinates:						
North latitude: 34-07-17						
West Longitude: 96-58-49						
AP278	278C3	Dickson	OK	353.8	6.60	12.0 -5.40 *
ALOPEN	278C3	Dickson	OK	357.2	7.31	12.0 -4.69 *
AP278	278C3	Dickson	OK	333.2	8.29	12.0 -3.71 *
AP278	278C3	Dickson	OK	305.3	11.68	12.0 -0.32 *
AP278	278C3	Dickson	OK	305.3	11.68	12.0 -0.32 *
Of Concern:						
IF short space to Ch 224A						
However, substitution of Ch 278C3						
proposed for allotment of Ch 277C						
@ Allen, TX and Ch 278C @ Anadarko, OK						
KOMAFM	223C	Oklahoma City	OK	343.5	165.00	165.0 0.00 *
KNINFM	225C1	Wichita Falls	TX	260.4	146.06	133.0 13.06
KMKT.C	226C3	Bells	TX	133.8	68.81	42.0 26.81
KKNGFM	227C	Newcastle	OK	332.2	126.80	95.0 31.80
ALOPEN	227C	Newcastle	OK	332.2	126.80	95.0 31.80
KFXI.C	221C1	Marlow	OK	303.6	118.03	75.0 43.03
KKNGFM	227C1	Newcastle	OK	334.5	131.44	75.0 56.44
KFXI.C	221C2	Marlow	OK	303.4	118.22	55.0 63.22

EXHIBIT E, FIGURE 23

**Allotment of CH224A
at Dickson, OK
MM Docket 98-198
Blue Bonnet Radio, Inc.**



**Allotment of CH224A
at Dickson, OK
Gain/Loss Study
MM Docket 98-198
Blue Bonnet Radio, Inc.**

**AP278C3
60 dBu Contour**

**Hypothetical
60 dBu Contour**

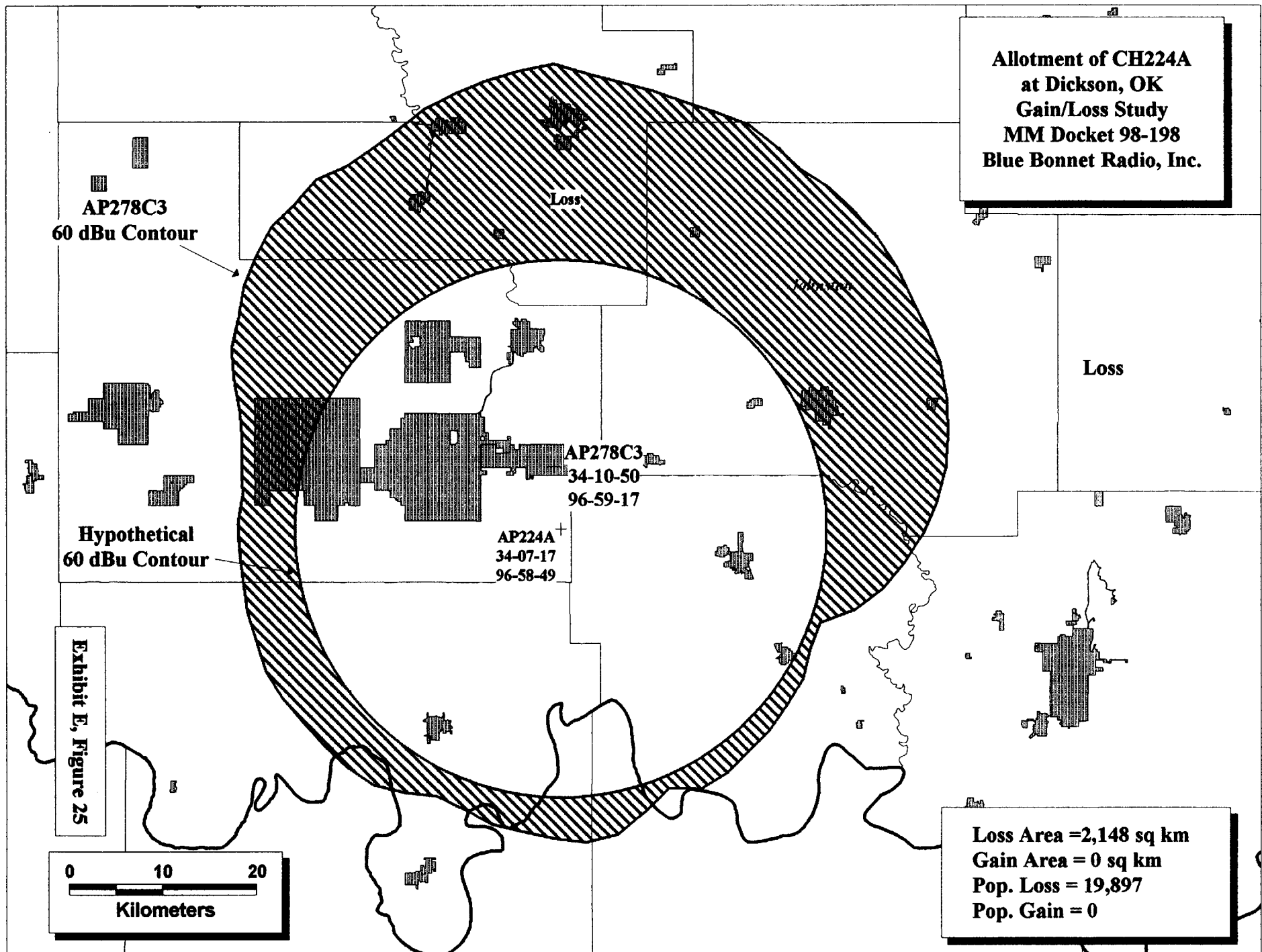
**AP278C3
34-10-50
96-59-17**

**AP224A
34-07-17
96-58-49**

Exhibit E, Figure 25

0 10 20
Kilometers

**Loss Area = 2,148 sq km
Gain Area = 0 sq km
Pop. Loss = 19,897
Pop. Gain = 0**



ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CHANNEL 298A (KHKC) ATOKA, OK

[DEPICTING SPACING FOR SUBSTITUTING CH 298A AT ATOKA, OK]

(USING PROPOSED ALLOTMENT COORDINATES AS REFERENCE)

34 28 57 N. Class A Search Date
96 05 06 W. Current rules spacings 12-14-98

Call	Ch#	City	Channel	298	-107.5	MHz		
				State	Bear'	Dist'	R'qrd	Margin
Community of Atoka				OK	202.3	11.96		
Reference Coordinates:								
North Latitude: 34-22-58								
West Longitude: 96-08-04								
KPLTFM	299C2	Paris		TX	152.4	106.00	106.0	0.00 *
ALOPEN	296C3	Durant		OK	227.3	42.01	42.0	0.01 *
KOMS	297C	Poteau		OK	71.2	165.39	165.0	0.39 *
KRXO	299C	Oklahoma City		OK	312.7	174.40	165.0	9.40 *
DE296	296C3	Durant		OK	210.2	61.68	42.0	19.68
KOAI	298C1	Fort Worth		TX	201.2	225.72	200.0	25.72
KOAI	298C1	Fort Worth		TX	201.5	225.83	200.0	25.83
KLBC.A	296A	Durant		OK	210.2	61.68	31.0	30.68
KLBC	296A	Durant		OK	210.2	61.68	31.0	30.68
AD296	296C3	Madill		OK	236.7	75.98	42.0	33.98
AD296	296A	Madill		OK	236.7	75.98	31.0	44.98

EXHIBIT E, FIGURE 26

**Allotment of CH228C3
at Atoka, OK
MM Docket 98-198
Blue Bonnet Radio, Inc.**

**Hypothetical
70 dBu Contour**

**AD298A
(KHKC.P)
34-28-57
96-05-06**

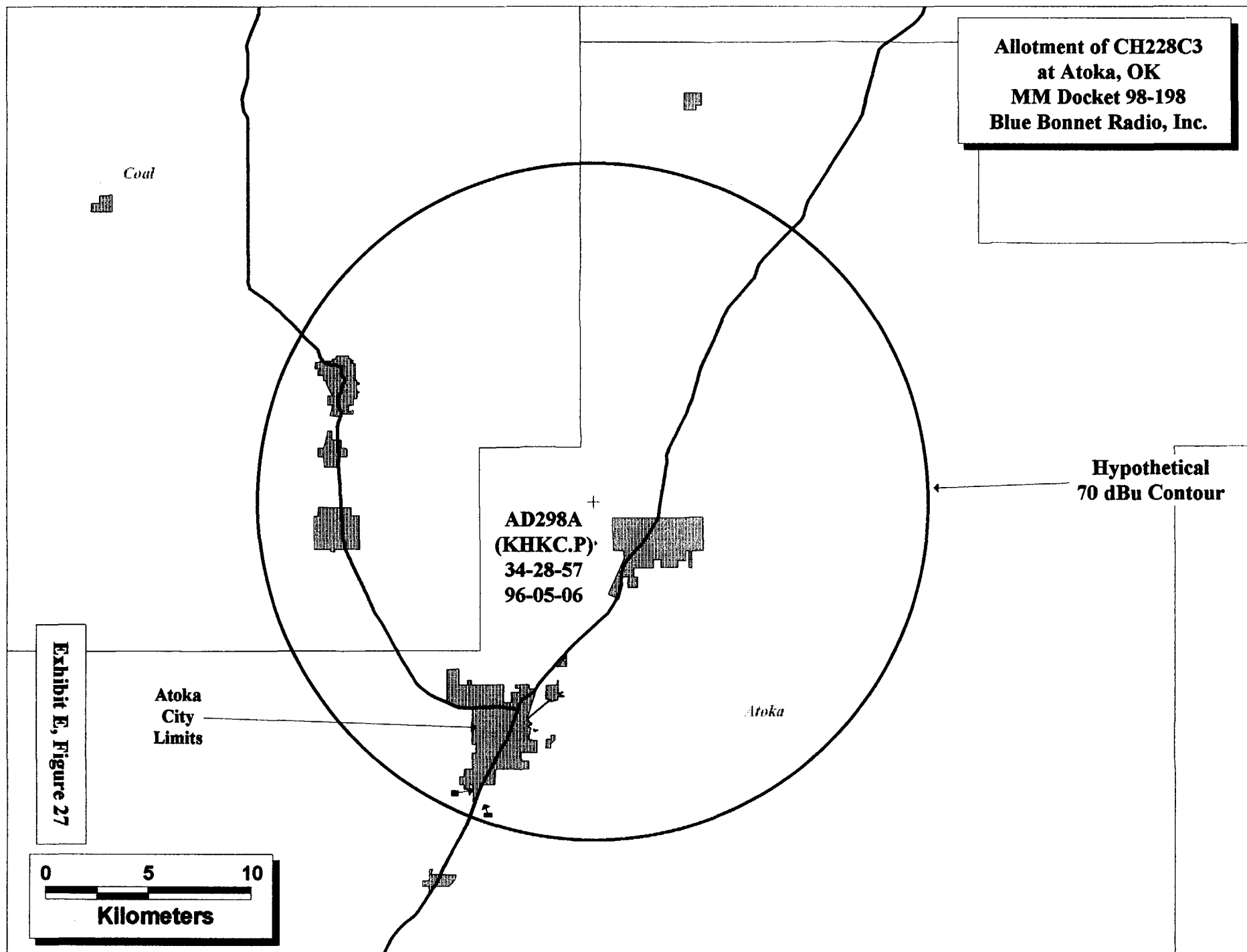
**Atoka
City
Limits**

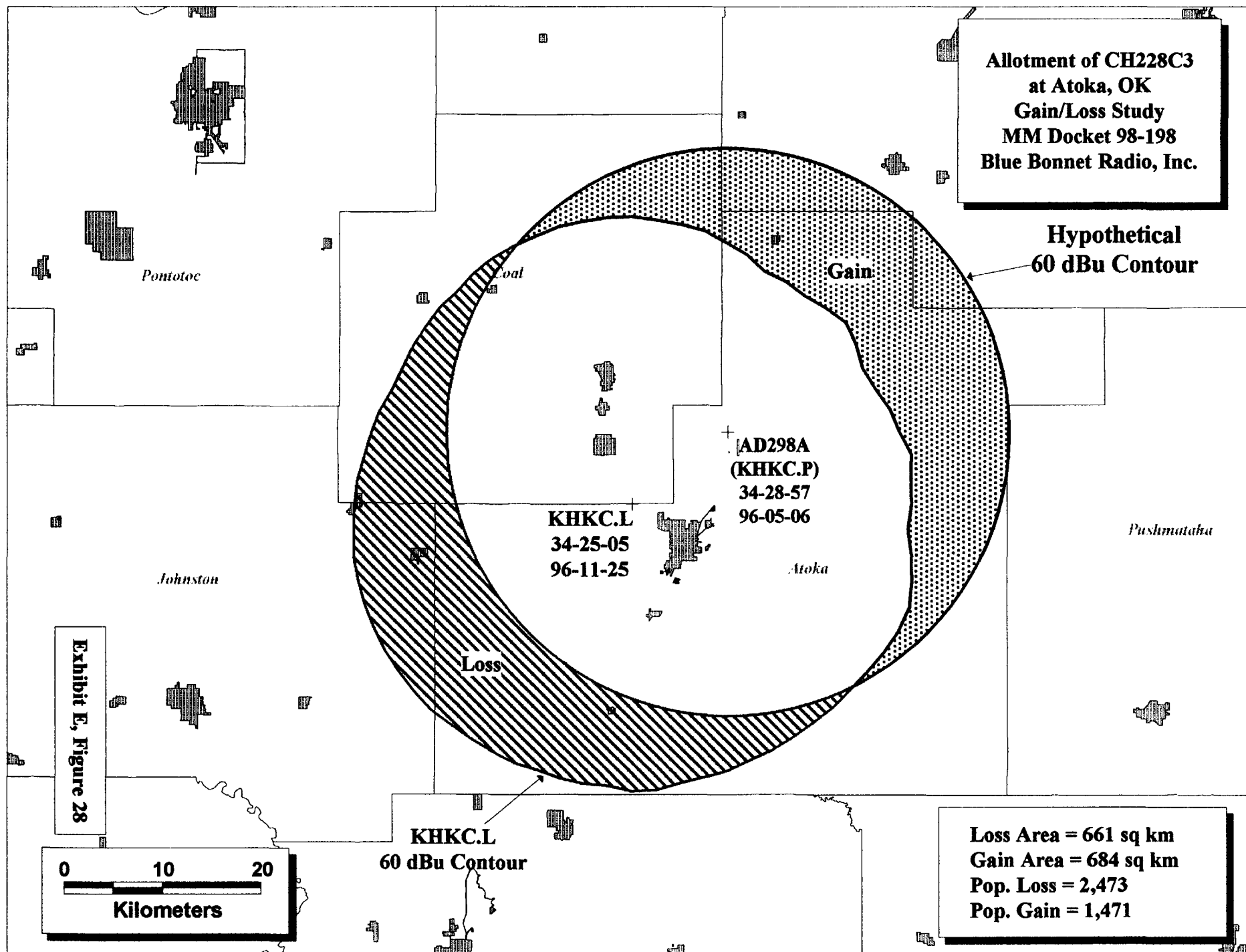
Atoka

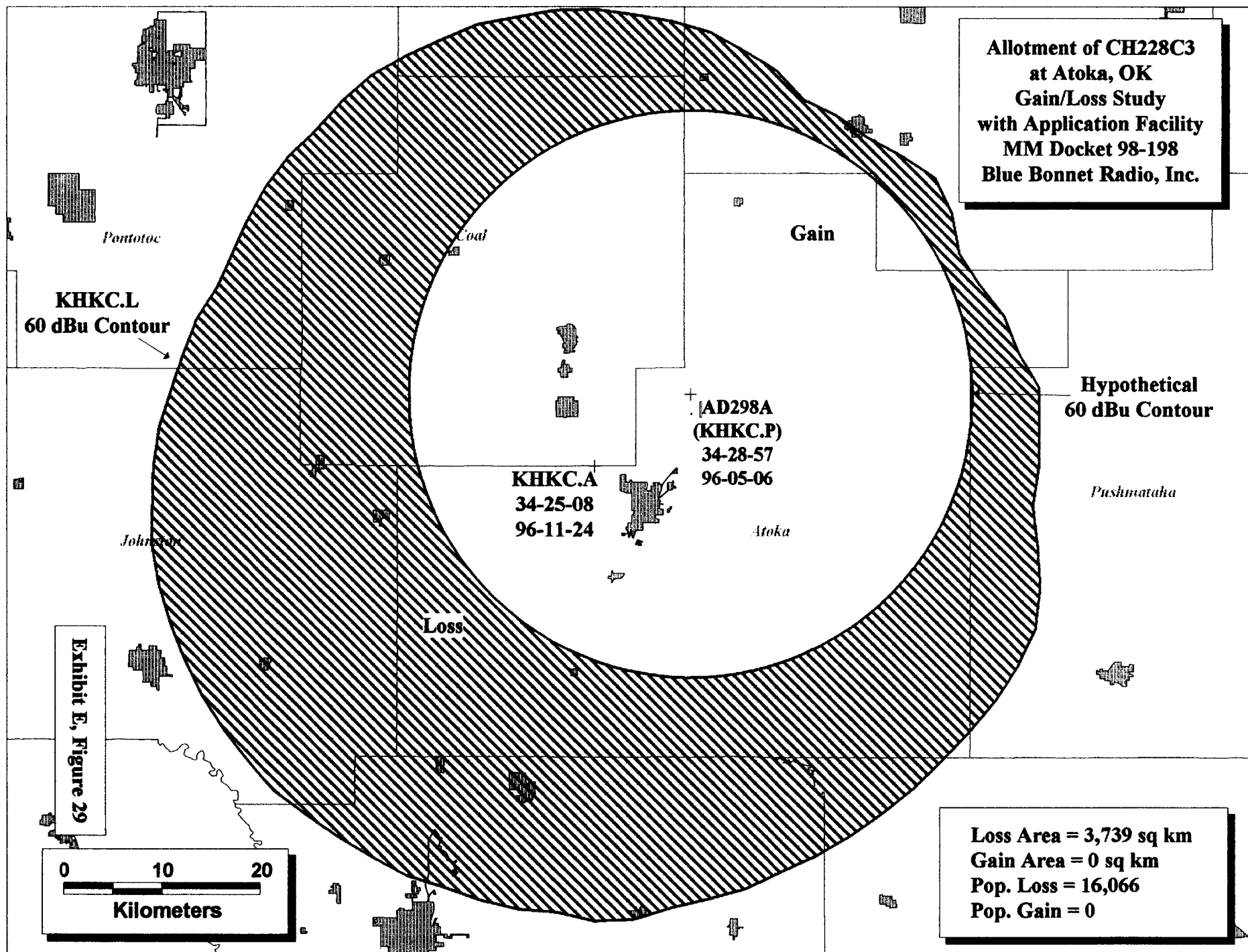
Coal

Exhibit E, Figure 27

0 5 10
Kilometers







Allotment of CH228C3
at Atoka, OK
Gain/Loss Study
with Application Facility
MM Docket 98-198
Blue Bonnet Radio, Inc.

KHKC.L
60 dBu Contour

Gain

Hypothetical
60 dBu Contour

KHKC.A
34-25-08
96-11-24

AD298A
(KHKC.P)
34-28-57
96-05-06

Loss

Pushmataha

Atoka

Exhibit E, Figure 29

0 10 20
Kilometers

Loss Area = 3,739 sq km
Gain Area = 0 sq km
Pop. Loss = 16,066
Pop. Gain = 0

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY -(KWOW.L) CH 281C3 CLIFTON, TX [DEPICTING SPACING & SUBSTITUTIONS FOR CH 281C3 ALLOTMENT] (USING LICENSED SITE AS REFERENCE)

31 47 40 N.			Class C3			Search Date	
97 27 17 W.			Current rules spacings			12-14-98	
-----			Channel 281 -104.1 MHz			-----	
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
Community of Clifton			TX	263.0	11.95		
Reference Coordinates:							
North Latitude: 31-46-53							
West Longitude: 97-34-48							
KXYLFM 281C1 Brownwood			TX	266.1	146.89	211.0	-64.11 *
Of Concern							
Substitution of Ch 245C1							
@ Licensed Site							
KKIK 282C2 Temple			TX	190.5	91.09	117.0	-25.91 *
Of No Concern							
Channel Deleted & allotted to							
Taylor, TX MM Docket 96-219							
KVILFM 279C		Highland Park-Dal	TX	27.4	98.29	96.0	2.29 *
KVILFM 279C		Highland Park-Dal	TX	27.4	98.29	96.0	2.29 *
KKDAFM 283C		Dallas	TX	27.2	98.90	96.0	2.90 *
KVILFM 279C		Highland Park-Dal	TX	27.5	99.30	96.0	3.30 *
KKDAFM 283C		Dallas	TX	27.4	99.32	96.0	3.32 *
KHLR 280C2		Cameron	TX	153.4	131.14	117.0	14.14
KKUS 281C2		Tyler	TX	67.4	201.66	177.0	24.66
KXIL 281C3		Sanger	TX	5.5	181.62	153.0	28.62
KKIK.C 282C2		Taylor	TX	176.7	151.02	117.0	34.02

EXHIBIT E, FIGURE 30

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.
WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - (KWOW.C) CH 281C3 CLIFTON, TX [DEPICTING SPACING & SUBSTITUTION FOR CH 281 ALLOTMENT] (USING KWOW APPLICATION SITE AS REFERENCE)

31 44 05 N.			Class C3				Search Date
97 19 17 W.			Current rules spacings				12-14-98
-----	Channel	281	-104.1 MHz	-----			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
Community of Clifton			TX	281.9	25.04		
Reference Coordinates:							
North Latitude: 31-46-53							
West Longitude: 97-34-48							
KXYLFM 281C1 Brownwood			TX	268.8	159.27	211.0	-51.73 *
Of Concern							
Substitution of Ch 245C1							
Proposed @ Licensed Site							
KKIK 282C2 Temple			TX	199.5	87.97	117.0	-29.03 *
Of No Concern							
Channel Deleted & Allotted to							
Taylor, TX MM Docket 96-219							
KHLR	280C2	Cameron	TX	157.4	119.83	117.0	2.83 *
KVILFM 279C	Highland Park-Dal	TX	19.2	99.42	96.0	3.42 *	
KVILFM 279C	Highland Park-Dal	TX	19.2	99.42	96.0	3.42 *	
KKDAFM 283C	Dallas	TX	19.0	100.07	96.0	4.07 *	
KVILFM 279C	Highland Park-Dal	TX	19.4	100.38	96.0	4.38 *	
KKDAFM 283C	Dallas	TX	19.3	100.42	96.0	4.42 *	
KKUS	281C2	Tyler	TX	64.1	192.96	177.0	15.96
KKIK.C 282C2	Taylor	TX	181.6	144.22	117.0	27.22	
KXIL	281C3	Sanger	TX	1.5	187.47	153.0	34.47

EXHIBIT E, FIGURE 31

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KCSC OPERATING, LTD

ALLOCATION STUDY - (KXYL) CH 245C1 BROWNWOOD, TX [DEPICTING SPACING & SUBSTITUTIONS FOR CHANNEL 245C1 ALLOTMENT] (USING LICENSED SITE AS REFERENCE)

31 42 16 N.			Class C1			Search Date
99 00 05 W.			Current rules spacings			12-14-98
----- Channel 245 - 96.9 MHz -----						
Call	Ch#	City	State	Bear'	Dist'	R'qrd Margin
Community of Brownwood			TX	53.9	3.03	
Reference Coordinates:						
North Latitude: 31-43-14						
West Longitude: 98-58-32						
AD 245 245C3 Cross Plains			TX	339.4	50.22	211.0 -160.78 *
Of Concern						
Substitution of Ch 290C3						
@ Petition Site Proposed						
KBALFM 246A San Saba			TX	154.5	63.13	133.0 -69.87 *
Of Concern						
Substitution of Ch 291A						
@ Licensed Site Proposed						
KVMX 244A Eastland			TX	10.2	86.93	133.0 -46.07 *
Of No Concern						
Substitution to Ch 236A						
MM Docket 96-10						
KEGL.C 246C		Fort Worth	TX	63.9	215.44	209.0 6.44 *
KEGL 246C		Fort Worth	TX	63.4	216.18	209.0 7.18 *
AD242 242C2		Menard	TX	218.1	90.78	79.0 11.78
KHFIFM 244C1		Georgetown	TX	143.2	191.38	177.0 14.38
KXOXFM 244A		Sweetwater	TX	303.5	157.40	133.0 24.40
AD242 242A		Llano	TX	162.4	101.43	75.0 26.43
KNKI.C 244C		Flower Mound	TX	36.5	239.16	209.0 30.16

Continued on next page

EXHIBIT E, FIGURE 32

Continued from previous page

31 42 16 N.				Class C1				Search Date
99 00 05 W.			Current	rules	spacings			12-14-98
			Channel	245 -	96.9 MHz			
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
AP242	242A	Llano		TX	161.1	106.16	75.0	31.16
KNKI.C	244C	Flower Mound		TX	52.2	241.72	209.0	32.72
AP242	242A	Llano		TX	163.8	108.61	75.0	33.61
AP242	242A	Llano		TX	160.0	120.06	75.0	45.06

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CH 290C3 (AD 245C3) CROSS PLAINS, TX

[DEPICTING CLEAR SPACING FOR SUBSTITUTION OF CH 290C3

@ CH 245C3 ALLOTMENT SITE]

(USING PETITIONER'S (ALALATEX) PROPOSED ALLOTMENT SITE AS REFERENCE)

32 07 42 N.				Class C3				Search Date
99 11 18 W.				Current rules spacings				12-14-98
-----				Channel 290 -105.9 MHz	-----			
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
Community of Cross Plains				TX	94.9	2.18		
Reference Coordinates:								
North Latitude: 32-07-36								
West Longitude: 99-09-55								
ALOPEN	292C2	Abilene		TX	308.3	62.17	56.0	6.17 *
KFQXFM	292A	Abilene		TX	308.3	62.17	42.0	20.17
AD236	236C3	Baird		TX	326.6	35.51	14.0	21.51
KBALFM	291A	San Saba		TX	156.7	113.24	89.0	24.24
Of Note:								
Proposed Substitution of								
Ch 291A for 246A @ KBAL								
Licensed Site								
NL; 31-11-26, WL; 98-42-55								
KRNB.C	289C	Decatur		TX	47.5	206.37	176.0	30.37
KRNB	289C	Decatur		TX	47.5	206.37	176.0	30.37
KRNB.C	289C	Decatur		TX	47.5	206.37	176.0	30.37
DE236	236A	Eastland		TX	40.5	50.70	12.0	38.70
KHKS	291C	Denton		TX	76.2	214.76	176.0	38.76
KHKS	291C	Denton		TX	76.2	215.02	176.0	39.02

EXHIBIT E, FIGURE 33

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - (KBAL) CH 291A SAN SABA, TX [DEPICTING SPACING & SUBSTITUTION FOR CH 291A ALLOTMENT] (USING LICENSED SITE AS REFERENCE)

31 11 26 N.				Class A				Search Date
98 42 55 W.				Current rules spacings				12-14-98
-----				Channel 291 -106.1 MHz	-----			
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
Community of San Saba				TX	298.1	1.11		
Reference Coordinates:								
North Latitude: 31-11-43								
West Longitude: 98-43-32								
AD291	291A	Mason		TX	225.1	69.44	115.0	-45.56 *
Of Concern								
Substitution of Ch 224A or 281A								
See Channel Studies								
for 224A & 281A								
KHKS	291C	Denton		TX	46.7	226.41	226.0	0.41 *
KHKS	291C	Denton		TX	46.8	226.58	226.0	0.58 *
AD293	293A	Llano		TX	175.7	48.98	31.0	17.98
AD291	291A	Kerrville		TX	197.8	133.19	115.0	18.19
AD293	293A	Llano		TX	137.6	53.84	31.0	22.84
AP290	290C2	Round Rock		TX	137.6	130.15	106.0	24.15
AD290	290C3	Cross Plains		TX	336.7	130.15	106.0	24.24
Of Note:								
Substitution of Ch 290C3 for								
245C3 Proposed @ Cross Plains								
in Instant Counterproposal								
See Cross Plain Channel Study								
KOOC	292C3	Belton		TX	97.2	113.78	89.0	24.78
KDXTFM	294C	Granbury		TX	28.3	133.66	95.0	38.66
KDXTFM	294C	Granbury		TX	28.6	137.01	95.0	42.01

EXHIBIT E, FIGURE 34

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - AD 224A (AD 291A) MASON, TX

[DEPICTING SPACING FOR SUBSTITUTION OF CH 224A FOR CH 291A AT MASON]
(USING AD CH 291A ALLOTMENT COORDINATES AS REFERENCE)

30 44 55 N.				Class A				Search Date
99 13 49 W.				Current rules spacings				12-15-98
----- Channel 224A - 92.7 MHz -----				State	Bear'	Dist'	R'qrd	Margin
Call	Ch#	City						
AD224	224A	Mason		TX	0.0	0.00	115.0	-115.00 *
Of Note: Substitution for Ch 291A proposed in previous PRM								
KITE	222C2	Kerrville		TX	177.2	70.02	55.0	15.02
KDCD	225C1	San Angelo		TX	300.8	148.71	133.0	15.71
KBLK	223A	Burnet		TX	84.5	92.87	72.0	20.87
KBLK.C	223A	Burnet		TX	84.6	93.10	72.0	21.10
KAJZ	227C	Killeen		TX	91.2	118.83	95.0	23.83
AD227	227C	Cedar Park		TX	91.2	118.83	95.0	23.83
KAJZ	227C	Killeen		TX	91.2	118.83	95.0	23.83
DE227	227C	Killeen		TX	91.2	118.83	95.0	23.83

EXHIBIT E, FIGURE 35

ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM Docket 98-198

BLUE BONNET RADIO, INC.

WBAP/KSCS OPERATING, LTD

ALLOCATION STUDY - CHANNEL 281A (AD 291A) MASON, TX
[DEPICTING SPACING FOR SUBSTITUTION OF CH 281 FOR CH 291 AT MASON
ONCE 245C1 IS SUBSTITUTED FOR CH 281C1 AT BROWNWOOD]
(USING CH 291A ALLOTMENT COORDINATES AS REFERENCE)

30 44 55 N.				Class A				Search Date
99 13 49 W.				Current rules spacings				12-14-98
----- Channel 281 -104.1 MHz -----								
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin	
KXYL	FM 281C1	Brownwood	TX	11.6	108.19	200.0	-91.81 *	
Of Concern: Substitution of Ch 245C1 proposed @ KXYL licensed site.								
AL280	280C	Ciudad Acuna	CI	226.1	227.55	215.0	12.55	
KBAE	284C3	Llano	TX	96.2	63.54	42.0	21.54	
DE284	284C3	Llano	TX	96.2	63.54	42.0	21.54	
AD283	283A	Eden	TX	311.6	78.37	31.0	47.37	
KOOK	228A	Junction	TX	239.2	58.38	10.0	48.38	
KWTR.C	281C1	Big Lake	TX	293.4	248.98	200.0	48.98	
KEYIFM	278C	San Marcos	TX	121.0	151.36	95.0	56.36	
KBLT	282A	Leakey	TX	205.7	129.90	72.0	57.90	
KWOW	281C3	Clifton	TX	55.6	205.03	142.0	63.03	
Of Note: Proposed substitution of Ch 281C3 @ KWOW licensed site								
KOOK.A	228C2	Junction	TX	249.8	82.12	15.0	67.12	
ALOPEN	228C2	Junction	TX	249.8	82.12	15.0	67.12	

Continued on next page

EXHIBIT E, FIGURE 36

Continued from previous page

30 44 55 N.			Class A				Search Date
99 13 49 W.			Current rules spacings				12-14-98
-----	-----	-----	Channel 281 -104.1 MHz	-----	-----	-----	-----
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
KWOW.C	281C3	Clifton	TX	59.0	212.18	142.0	70.18
Of Note:							
Proposed substitution of Ch 281C3							
@ KWOW CP site							
KQBT	282C2	Taylor	TX	101.0	182.29	106.0	76.29